Exhibit 24

1	·
	Page 119
1	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA
2	ATLANTA DIVISION
3	A.G.,
	Plaintiff,
4	Civil Action No.
7	vs.
5	1:20-cv-05231-JPB
Э	
_	NORTHBROOK INDUSTRIES, INC.,
6	d/b/a UNITED INN AND SUITES, Volume II
	Defendant.
7	
	G.W.,
8	Plaintiff,
	Civil Action No.
9	vs.
	1:20-cv-05232-JPB
10	NORTHBROOK INDUSTRIES, INC.,
	d/b/a UNITED INN AND SUITES,
11	Defendant.
12	J.G.,
	Plaintiff,
13	Civil Action No.
10	vs.
1 /	1:20-cv-05233-SEG
14	
	NORTHBROOK INDUSTRIES, INC.,
15	d/b/a UNITED INN AND SUITES,
	Defendant.
16	
17	
18	CONTINUED VIDEOTAPED DEPOSITION OF ASHAR ISLAM
19	May 2, 2023 - 5:10 p.m.
20	1105 West Peachtree Street, NE
21	Suite 1000
22	
23	Atlanta, Georgia
24	, 5
25	J. David Brown, B-1401
-	

Veritext Legal Solutions

	tries, me. 4/0/4 Cinted min and Suites
	Page 122
1 INDEX OF EXHIBITS 2	1 PROCEEDINGS
3 EXHIBIT DESCRIPTION PAGE	2
4 Exhibit 3 11/14/2017 email from Chief Sumlin	3 THE VIDEOGRAPHER: This will be the video
to unitedinn4649 attaching Brown	4 deposition of Ashar Islam being taken in the matter
5 Protective Services Proposal for	5 of A.G. versus Northbrook Industries, Inc. d/b/a
Security Services * 128	6 United Inn and Suites. Today's date is May 2nd,
Exhibit 5 8/15, 8/16, and 8/17/2017 email chain	
7 between Mr. Shareef and Agent	7 2023. The time on the record is 5:09 p.m. My name
Strickler * 151	8 is Brandon Brantley. I'm the videographer.
8	9 Counsel, please introduce yourselves for
Exhibit 10 10/29/2018 email from Inv. Wade to	10 the record after which the court reporter will
9 unitedinn4649 attaching Ex. 9 * 133 10 Exhibit 28 text messages between Mr. Islam and	11 swear in the witness.
Sergeant Weber * 144	MR. BOUCHARD: Good afternoon. David
11	13 Bouchard on behalf of Plaintiff A.G., G.W., and
Exhibit 29 human trafficking articles * 147	14 J.G.
* denotes proviously modes d	15 MS. RICHENS: Dana Richens with Smith
* denotes previously marked	16 Gambrell and Russell representing Northbrook
14 INDEX TO EXAMINATIONS	
15 PAGE	17 Industries, Inc. in the J.G. matter.
16 By Mr. Bouchard 124	18 MR. UNDERRINER: Eric Underriner with
17 18	19 Hall Booth Smith representing Northbrook Industries
18	20 in the A.G. and G.W. matters.
20	21 ASHAR ISLAM
21	22 having been first duly sworn, was examined and
22	23 testified as follows:
23	24 MR. BOUCHARD: This deposition is being
24 25	25 taken on behalf of Plaintiff A.G. in Case No.
	Page 123
1 APPEARANCES OF COUNSEL: 2 On behalf of the Plaintiffs:	1 1:20-cv-05231. This deposition is also being
3 DAVID H. BOUCHARD, ESQ.	2 cross-noticed in Case No. 1:20-cv-05232 which is
Finch McCranie LLP 4 229 Peachtree Street, NE	3 G.W.'s lawsuit and in Case No. 1:20-cv-05233 which
4 229 Peachtree Street, NE Suite 2500	4 is J.G.'s lawsuit.
5 Atlanta, Georgia 30303	5 Counsel for the Defendants in all three
404.658.9070	6 cases are present after receiving reasonable
On behalf of Defendant in the J.G. case:	7 notice of the deposition. All objections other
7	8 than to the form of a question or to an issue of
DANA RICHENS, ESQ.	
8 Smith, Gambrell & Russell, LLP 1105 West Peachtree Street, NE	9 privilege are preserved. Is that agreeable?
9 Suite 1000	MS. RICHENS: Yes, it is.
Atlanta, Georgia 30309 10 404.815.3500	11 MR. UNDERRINER: Yes.
11 On behalf of Defendant in the A.G. and G.W. cases:	MR. BOUCHARD: And this deposition is
12 ERIC UNDERRINER, ESQ.	13 taken pursuant to properly served deposition
Hall Booth Smith, P.C. 13 2710 Old Milton Parkway	14 notices and cross-notices and is taken for all
Suite 200	15 purposes permitted under the Federal Rules of Civil
14 Alpharetta, Georgia 30009	16 Procedure and the Georgia Civil Practice Act
470.386.6900 15	17 including, but not limited to, preservation of
Also Present:	18 testimony and cross-examination. Is that agreed?
DRANDON DRANTH EV. Videosuskus	
BRANDON BRANTLEY, Videographer	19 MS. RICHENS: Yes.
18	20 MR. UNDERRINER: Yes.
19	21 MR. BOUCHARD: Mr. Court Reporter, the
20 21	22 same rule I would ask be applied to this transcript
22	23 as was applied to Mr. Shareef's and to the 30(b)(6)
23	24 for United Inn which is that all references to the
24 25	25 Plaintiffs by name should be modified in the

2 (Pages 120 - 123)

I transcript to only reference their initials. 2		A.G. v. Northbrook industries,	mc.	. d/b/a United Init and Suites		
2		Page 124		Page 126		
3 BY MR. BOUCHARD: 4 Q Mr. Islam, nice to see you again, sir. 5 A Yes, sir. 6 Q I will refer, sir, to the United Inn and 7 Suites, the United Inn, the hotel at various points 8 through the deposition today. 9 A Okay. 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Sharcef, and so there 25 will be less for you. 25 Yes, sir. 26 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with 11 question before giving your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q I you answer a question, I'm going to 22 the question, please. 23 By MR. BOUCHARD: 24 Q I Jy you answer a question, I'm going to 25 the question, please. 26 I be the form of 27 any reason, just let me know. 27 A Yes. 28 Q I be the form of 29 any reason, just let me know. 29 A Okay. 20 I guity ou answer a question, I'm going to 20 I go don't understand a question for 21 any reason, just let me know. 22 A Okay. 23 Q Or any controlled in and the set in the provide services at the hotel? 24 Q I Jy you answer a question, I'm going to 25 Go Did you have any responsibilities for 26 G Person the form of the lawyers as a will be captured in a provide services at the hotel? 27 A Okay. 28 A Okay. 29 Q I be the thing the deposi	1	transcript to only reference their initials.	1	A Okay.		
4 testimony today? 5 A Yes. sir. 10 Q Iwill refer, sir, to the United Inn and 7 Suites, the United Inn, the hotel at various points 8 through the deposition today. 9 A Okay. 10 Q Please understand, sir, unless I tell you 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 5 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A U-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand hat? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q and I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q I'm you answer a question, I'm going to 22 any reason, just let me know. 23 Q Almy you understand, Mr. Islam, that 24 testimony? 2 A Yes, sir. 24 Q I'm sure recording our conversation. 25 A Uh-huh (affirmative). 26 Q Everything in your individual capacity, 11 fight? 12 A Yes, sir. 13 Q and I promise I will try to wait to ask a 14 new question until you're done with your answer. 16 A Okay. 17 Q I'l ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know. 27 Q I'm you answer a question, I'm going to 28 Drive testifying in your individual capacity, 11 fight? 12 A Yes, sir.	2	= -		Q Is there any reason you're not in a		
5 A Yes, sir. 6 Q I will refer, sir, to the United Inn and 7 A Vices. the United Inn, the hotel at various points 8 through the deposition today. 9 A Okay. 10 Q Please understand, sir, unless I tell you 11 otherwise. I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 A Yes. 8 Q — testimony? And you understand, Mr. Islam, that 10 you're testifying in your individual capacity, 11 right? 12 A Yes, sir. 13 Q Based on your personal knowledge and 14 experiences at the hotel? 15 A Yes. 6 Q In your time from 2017 to 2019 at the 17 hotel, your title was manager 18 A Yes. 10 Q Di you have any responsibilities during 20 Did you have any responsibilities for 12 A No. 22 A No. 23 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 C Ho lawyers say will be captured in a 8 record. Do you understand that? 9 Q During that time period, that is 2017 to 10 Q Please try to wait until I am done with 1 question before giving your answer. 10 Q Please try to wait until I was does 10 A Okay. 10 A Okay. 11 Gring security at the ho	3	BY MR. BOUCHARD:	3	deposition to provide good, complete, and accurate		
6 Q I will refer, sir, to the United Inn and 7 Suites, the United Inn, the hotel at various points 8 through the deposition today. 9 A Okay. 10 Q Please understand, sir, unless I tell you 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 11 A Okay. 12 Q If I ask a question which doesn't make 14 new question until you're done with your answer. 17 Q If I ask a question which doesn't make 18 sense, which is certaintly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q I fyou don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q I lyou answer a question, I'm going to	4	Q Mr. Islam, nice to see you again, sir.	4	testimony today?		
6 Q I will refer, sir, to the United Inn and 7 Suites, the United Inn, the hotel at various points 8 through the deposition today. 9 A Okay. 10 Q Please understand, sir, unless I tell you 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 11 A Okay. 12 Q If I ask a question which doesn't make 14 new question until you're done with your answer. 17 Q If I ask a question which doesn't make 18 sense, which is certaintly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q I fyou don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q I lyou answer a question, I'm going to	5	A Yes, sir.	5	A I'm good.		
7 Suites, the United Inn, the hotel at various points 8 through the deposition today. 8 A Okay. 10 Q Please understand, sir, unless I tell you 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today. Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 14 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 2 Q I got you don't understand a question for 22 any reason, just let me know. 3 A Okay. 2 Q If you on's testifying in your individual capacity, 11 right? 12 A Yes. sir. 13 Q Based on your personal knowledge and experiences at the hotel? 14 experiences at the hotel? 15 A Yes. 16 Q In your time from 2017 to 2019 at the experiences at the hotel? 20 A Uh-huh (affirmative). 21 A No. 22 Did you have any responsibilities during 22 that time period, Mr. Islam, that 10 your have any responsibilities for 4 seeking proposals from other security at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 2 Q Did you fave any responsibilities for 4 seeking proposals from other security at	6	Q I will refer, sir, to the United Inn and	6			
9 And you understand, Mr. Islam, that 10 Q Please understand, sir, unless I tell you 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 25 Q Did you have any responsibilities for Page 127 1 firing security at the hotel? 2 A No. 2 Did you have any responsibilities for 1 firing security at the hotel? 2 A No. 2 Q I'm sure you understand that? 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 4 Q Did you have any responsibilities for 1 firing security at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A No. 23 A Okay. 24 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Yes. 21 Q If you don't understand a question for 22 any reason, just let me know	7	Suites, the United Inn, the hotel at various points	7	A Yes.		
9 And you understand, Mr. Islam, that 10 Q Please understand, sir, unless I tell you 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 Q If you don't understand a question for 22 any reason, just let me know. 23 Q If you on't understand a question for 24 Q If you don't understand a question for 25 Q If you answer a question, I'm going to	1		8	Q testimony?		
10 you're testifying in your individual capacity, 11 otherwise, I'm referring to the United Inn and 12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 right? 12 A Yes. 13 Q Based on your personal knowledge and 14 experiences at the hotel? 15 A Yes. 16 Q In your time from 2017 to 2019 at the 17 hotel, your title was manager 18 A Yes. 19 Q is that correct? 20 A Uh-huh (affirmative). 21 Q Did you have any responsibilities during 22 that time period, Mr. Islam, for hiring security at 23 the hotel? 24 A No. 25 Q Did you have any responsibilities for 25 will be less for you. 26 Q Did you have any responsibilities for 27 kind of like a brochure or something, yeah, just 28 pass it on, yeah. 29 Q During that time period, that is 2017 to 20 Q During that time period, that is 2017 to 20 Did you have any responsibilities for 29 Q During that time period, that is 2017 to 20 Did you have any responsibilities for 20 A Yes, sir. 21 Q If I ask a question which doesn't make 22 that time period, Mr. Islam, for hiring security at the hotel? 24 A No. 25 Q Did you have any responsibilities for 25 will be the hotel? 26 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services at the hotel? 26 A Yes. If somebody come and give us some 27 kind of li	9	A Okay.	9	And you understand, Mr. Islam, that		
11 right? 2	10	Q Please understand, sir, unless I tell you	10	you're testifying in your individual capacity,		
12 Suites at 4649 Memorial Drive. 13 A Okay. 14 Q Does that make sense? 15 A Yes. 16 Q I do not think the deposition will take 17 very long today. Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with at new question until you're done with your answer. 11 Q A Okay. 12 Q I'f I ask a question which doesn't make 12 Sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 Mr. Shat correct? 26 A Uh-huh (affirmative). 27 A No. 28 A No. 29 Did you have any responsibilities for 16 riving security at the hotel? 20 A Okay. 21 Q I'd you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 21 A No. 22 A No. 23 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers other than Weber or 4 seeking proposals from other security services 5 providers other than Weber or McClelland? 25 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 11 A Okay. 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel? 26 A No. 27 Q I'll ask a question which doesn't make 18 sense, which is certainly	11					
14 Q Does that make sense? 14 experiences at the hotel? 15 A Yes. 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 18 A Yes. 19 Q - is that correct? 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 6 A Yes. 1 services providers other than Weber or McClelland? 1 services providers other than Weber or McClelland? 2 A Not to my knowledge, yeah. 1 services providers other than Weber or McClelland? 1 services providers	1		12	A Yes, sir.		
14 Q Does that make sense? 14 experiences at the hotel? 15 A Yes. 15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 18 A Yes. 19 Q - is that correct? 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 6 A Yes. 1 services providers other than Weber or McClelland? 1 services providers other than Weber or McClelland? 2 A Not to my knowledge, yeah. 1 services providers other than Weber or McClelland? 1 services providers	13	A Okay.	13	Q Based on your personal knowledge and		
15 A Yes. 16 Q I do not think the deposition will take 17 very long today, Mr. Islam. I'm going to do my 18 best to be as efficient as possible. 19 A Okay. 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q I'm you answer a question, I'm going to 25 Intention from 2017 to 2019 at the 17 hotel, your title was manager 18 A Yes. 19 Q is that correct? 20 A Uh-huh (affirmative). 21 Q Did you have any responsibilities during 22 that time period, Mr. Islam, for hiring security at the hotel? 24 A No. 25 Q Did you have any responsibilities for 25 will be less for you. 26 A Na No. 3 Q Did you have any responsibilities for 3 firing security at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security at the hotel? 2 A No. 2 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that ti	14	•	14			
17 hotel, your title was manager 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to	15	A Yes.		*		
17 hotel, your title was manager 18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to	16	Q I do not think the deposition will take	16	Q In your time from 2017 to 2019 at the		
18 best to be as efficient as possible. 19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. 20 Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 4 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 B Y MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland 25 that time period, Mr. Islam, for hiring security at the hotel? 26 A No. 27 Did you have any responsibilities during 28 that time period, Mr. Islam, for hiring security at the hotel? 29 Did you have any responsibilities during 20 La No. 20 Did you have any responsibilities during 21 that time period, Mr. Islam, for hiring security at the hotel? 22 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide	1			-		
19 A Okay. 20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 I A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 8 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to	1		1	,		
20 Q I apologize for keeping you waiting since 21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. 20 Page 125 1 A Okay. 21 Q I'm sure you remember the ground rules 23 for depositions. There's a court reporter and a 24 videographer. They are recording our conversation. 25 A Uh-huh (affirmative). 26 Q Everything you say and that I say and 27 that any of the lawyers say will be captured in a 28 record. Do you understand that? 29 A Yes, sir. 20 Q Please try to wait until I am done with a 21 question before giving your answer. 21 Q If I ask a question which doesn't make 22 as A Okay. 23 A Okay. 24 Q If you don't understand a question for 25 any reason, just let me know. 26 Q If you answer a question, I'm going to 27 that time period, Mr. Islam, for hiring security at the hotel? 28 that time period, Mr. Islam, for hiring security at the hotel? 29 A No. 20 Did you have any responsibilities during 20 that time period, Mr. Islam, for hiring security at the hotel? 21 A No. 22 A No. 23 Q Did you have any responsibilities during 24 that time period, Mr. Islam, for hiring security at the hotel? 24 A No. 35 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 seeking proposals from other security at the hotel? 4 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security at the hotel? 4 seeking proposals from other security services 5 providers other that with provide services at the hotel? 5 A No South a	1					
21 3:00. 22 A That's okay. 23 Q Sometimes my estimates are off. But we 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. 24 A No. 25 Q Did you have any responsibilities during 26 the hotel? 27 A No. 28 Q I'm sure you remember the ground rules 38 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 4 Videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 the hotel? 26 A No. 27 Did you have any responsibilities during that time period, Mr. Islam, for hiring security at the hotel? 28 A No. 29 Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 4 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just services providers other than Weber or McClelland? 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel? 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that co	20	•		~		
22 that time period, Mr. Islam, for hiring security at 23 the hotel? 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 2 any reason, just let me know. 22 that time period, Mr. Islam, for hiring security at 2 the hotel? 24 A No. 25 Q Did you have any responsibilities for 26 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 29 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 any reason, just let me know. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland				· · · · · · · · · · · · · · · · · · ·		
23 de hotel? 24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to Page 127 1 firing security at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A No. 13 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security at the hotel? 2 ha Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that			1			
24 got a lot more done with Mr. Shareef, and so there 25 will be less for you. Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 11 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 22 A Okay. 24 Q If you answer a question, I'm going to		· · · · · · · · · · · · · · · · · · ·				
25 Will be less for you. Page 125 A Okay. Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 22 Q If you answer a question, I'm going to 25 Q Did you have any responsibilities for 26 A No. 3 Q Did you have any responsibilities for 3 keeking proposals from other security services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 20 A Yes. 21 M S. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland	24		24	A No.		
Page 125 1 A Okay. 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to Page 127 1 firing security at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel? 2 A Not to my knowledge. 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and		_	25	Q Did you have any responsibilities for		
1 firing security at the hotel? 2 Q I'm sure you remember the ground rules 3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 1 firing security at the hotel? 2 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A No. 3 Q Did you have any responsibilities for 4 seeking proposals from other security services 5 providers that might provide services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 any reason, just let me know. 23 BY MR. BOUCHARD: 24 Q And would Sergea		Poses 125		Page 127		
2	1		1			
3 for depositions. There's a court reporter and a 4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 3 Q Did you have any responsibilities for 4 seeking proposals from other security services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland		•				
4 videographer. They are recording our conversation. 5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 24 seeking proposals from other security services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland						
5 A Uh-huh (affirmative). 6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 5 providers that might provide services at the hotel? 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland						
6 Q Everything you say and that I say and 7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 6 A Yes. If somebody come and give us some 7 kind of like a brochure or something, yeah, just 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 W.S. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland		• •				
7 that any of the lawyers say will be captured in a 8 record. Do you understand that? 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 20 Puring that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland				*		
8 pass it on, yeah. 9 A Yes, sir. 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 8 pass it on, yeah. 9 Q During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland						
9 Q During that time period, that is 2017 to 10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 20 During that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, that is 2017 to 10 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, that is 2017 to		• • • • •				
10 Q Please try to wait until I am done with a 11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 21 D 2019, do you recall considering any other security 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 Q If you don't understand a question for 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland				•		
11 question before giving your answer. 12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 11 services providers other than Weber or McClelland? 12 A Not to my knowledge, yeah. 13 Q In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland			1			
12 A Okay. 13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 In other words, during that time period, 16 A Weber 17 Q In other words, during that time period, 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland						
13 Q And I promise I will try to wait to ask a 14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 In other words, during that time period, 14 the security at the hotel was from 10:00 p.m. to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland			1	÷		
14 new question until you're done with your answer. 15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland		•				
15 Okay? 16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 15 2:00 a.m. by Sergeant Weber 16 A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland						
16 A Okay. 17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 If A Weber 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland	1			-		
17 Q If I ask a question which doesn't make 18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 If I ask a question which doesn't make 17 Q or McClelland? 18 A Yes. 19 Q Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland	1	•	1	, ,		
18 sense, which is certainly very likely to happen, 19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 Is that correct? 26 A Yes. 27 A Yes. 28 Py MS. RICHENS: I'll object to the form of 22 the question, please. 29 BY MR. BOUCHARD: 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 21 BY MR. BOUCHARD: 22 Q And would Sergeant Weber and McClelland		•				
19 please let me know and I'll try to rephrase it. 20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 29 Is that correct? 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland	1			-		
20 A Okay. 21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 20 A Yes. 21 MS. RICHENS: I'll object to the form of 22 the question, please. 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland	1					
21 Q If you don't understand a question for 22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 MS. RICHENS: I'll object to the form of 26 the question, please. 27 BY MR. BOUCHARD: 28 Q And would Sergeant Weber and McClelland	1	-		-		
22 any reason, just let me know. 23 A Okay. 24 Q If you answer a question, I'm going to 25 the question, please. 26 BY MR. BOUCHARD: 27 Q And would Sergeant Weber and McClelland						
23 A Okay. 24 Q If you answer a question, I'm going to 23 BY MR. BOUCHARD: 24 Q And would Sergeant Weber and McClelland				-		
24 Q If you answer a question, I'm going to 24 Q And would Sergeant Weber and McClelland				<u> </u>		
				_		

3 (Pages 124 - 127)

A.G. v. Northbrook Industries,	me. d/ b/ d Cinted inii and Suites		
Page 128	Page 130		
1 other would not be there?	1 people?		
2 A One at a time.	2 A Yeah, I asked them, yes, what they do.		
3 Q One at a time. And they would cover the	3 And they say they are private security services,		
4 entire seven-day week between the two of them?	4 service company. And sometime I ask them okay,		
5 A Yes.	5 what kind of like services they do. They say we		
6 Q Did you ever want to hire a different	6 patrol and check if anything suspicious and they		
7 security services company for the hotel other than	7 can call DeKalb County and they come and solve the		
8 Sergeant Weber or McClelland?	8 problem. I say okay. So that's what we are doing		
9 A No.	9 over here. So the only thing is we're not able to		
	10 go 24/7 outside, but we can watch the camera, and		
	11 whenever we see we call 911 or whatever that		
11 which this is the first exhibit in your deposition,			
12 Mr. Islam. But for the sake of efficiency and	12 related person is, yes.		
13 simplicity, we're keeping the same numbers of	Q Why did you not move forward with any of		
14 exhibits from Mr. Shareef's deposition. So this	14 these security vendors that were dropping off their		
15 was the third exhibit in Mr. Shareef's deposition,	15 cards?		
16 so I'm going to call it Plaintiff's Exhibit 3.	16 A I'm not sure. Because the thing is the		
17 A Uh-huh (affirmative).	17 officer make the decision right away, the officers.		
18 Q And it is Bates stamped NBI 3765 through	18 Because I don't have any experience to work with		
19 NBI 3774. And it is an email from Chief Sumlin to	19 those security company strictly, so that's why I		
20 unitedinn4649@Gmail. Do you see that?	20 don't know their credibility. So myself I rely on		
21 A Yes, I do.	21 the officers that the local police, they can come		
22 Q Have you seen this email before,	22 right away and solve the issue if we have any		
23 Mr. Islam?	23 problems.		
24 A I don't remember.	24 Q If I'm understanding you correctly,		
25 Q You do not remember?	25 you're saying you were comfortable calling 911 if		
Page 129	Page 131		
1 A No.	1 you saw an issue as opposed to having a private		
2 Q Do you remember seeing this proposal from	2 security company?		
3 Brown Security Services?	3 A Yes. I can say I'm confident they can		
4 A I am not exactly sure about this security	4 come and solve the issue.		
5 company. But I do see some security company	5 Q Did you ever recommend at any point in		
	1 5 O Did voll ever recommend at any point in		
6 proposals ves	· · · · · · · · · · · · · · · · · · ·		
6 proposals, yes.	6 time that the hotel hire security for the other 20		
7 Q Is this a proposal that you had seen back	6 time that the hotel hire security for the other 20 7 hours per day?		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes.		
 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the		
 7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people		
 7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some		
 7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah.		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019,		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes.	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam?	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No.	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No.		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No. 19 Q And that would have happened sometime	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No. 17 Q 24 hours a day?		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No.	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No. 17 Q 24 hours a day? 18 A No.		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No. 19 Q And that would have happened sometime	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No. 17 Q 24 hours a day? 18 A No. 19 Q Was it ever your opinion during that time		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No. 19 Q And that would have happened sometime 20 between 2017 and 2019 do you believe?	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No. 17 Q 24 hours a day? 18 A No. 19 Q Was it ever your opinion during that time 20 period that there should be more security at the		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No. 19 Q And that would have happened sometime 20 between 2017 and 2019 do you believe? 21 A Maybe, yeah. I'm not sure.	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No. 17 Q 24 hours a day? 18 A No. 19 Q Was it ever your opinion during that time 20 period that there should be more security at the 21 hotel?		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No. 19 Q And that would have happened sometime 20 between 2017 and 2019 do you believe? 21 A Maybe, yeah. I'm not sure. 22 Q And these are people just coming by and	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No. 17 Q 24 hours a day? 18 A No. 19 Q Was it ever your opinion during that time 20 period that there should be more security at the 21 hotel? 22 A No. Because most of the time we solve		
7 Q Is this a proposal that you had seen back 8 in 2017 when it was emailed to the hotel or 9 A I don't recall. 10 Q Do you recall ever talking with anybody 11 from this security services company, Brown Security 12 Services? 13 A I'm not exactly sure about this one. But 14 I do, yeah, some security people come and introduce 15 their company, yes. 16 Q Do you remember the names of any of those 17 companies, Mr. Islam? 18 A No. 19 Q And that would have happened sometime 20 between 2017 and 2019 do you believe? 21 A Maybe, yeah. I'm not sure. 22 Q And these are people just coming by and 23 dropping business cards?	6 time that the hotel hire security for the other 20 7 hours per day? 8 A I just not recommend but sometime yes. 9 But now the days, not at that time. But now the 10 days whenever we have too much like homeless people 11 around, now we really are considering to have some 12 people who can do those security things, yeah. 13 Q So during that time period 2017 to 2019, 14 you did not recommend having private security at 15 the hotel 16 A No. 17 Q 24 hours a day? 18 A No. 19 Q Was it ever your opinion during that time 20 period that there should be more security at the 21 hotel? 22 A No. Because most of the time we solve 23 that problem with the DeKalb County. So I think		

4 (Pages 128 - 131)

A.G. v. Northbrook industries,	me. d/b/a Omted mil and Suites
Page 132	Page 134
1 Q So if I understand correctly, Plaintiff's	1 A Yes, it is.
2 Exhibit 3 is not a proposal that you remember	Q It says: Ashar was advised by her
3 reviewing in 2017, it appears like it is new to	3 guardian that she was staying at United Inn located
4 you?	4 at 4649 Memorial Drive. Thank you for your help.
5 A Maybe I saw that but I don't remember the	5 Do you see that, sir?
6 exact that company. I saw a couple of proposals.	6 A Yes, I do see.
7 Some handout, some on email, yes, I do. But I'm 8 not familiar I not remember this security	7 Q And the subject line is Missing Person,
	8 right? 9 A Uh-huh (affirmative).
9 company name, yeah. 10 Q And you are aware that there were	10 Q Is that correct?
11 security companies that provided 24/7	11 A The subject line is?
12 A Yes.	12 Q The subject line says Missing Person. Do
13 Q security?	13 you see that?
14 A Yes.	14 A Yes. Sometime, yeah, parents when they
15 Q You saw proposals from some of those	15 come, they ask they show us picture and they
16 companies?	16 show us names. And if we have somebody with this
17 A Yeah.	17 name registered, we just let them know, yes.
18 Q Why did you not select any of those?	18 Q Right. I'm just asking, you see this
19 A Because we already have the DeKalb	19 A I'm not exactly sure about this
20 County. And as I said, that whenever we have we	20 Q The subject line on that
21 are open 24/7 and we just have eyes and ears. Some	21 A Yeah.
22 of our housekeepers, some of our maintenance	22 Q email
23 people, some of our even the tenants whenever	23 A Yeah.
24 they let us know, we can call and point out those	24 Q it reads Missing Person?
25 rooms, those issues, those problems. Because we	25 A Yeah, Missing Person, yes, sir.
Page 133	Page 135
1 never close, so somebody was there at the office to	1 Q Right. So you received that email,
2 take care of our I can say convey that to the	2 Mr. Islam?
3 DeKalb County.	3 A Yes. According to that, yes.
4 Q Convey that to	4 Q I realize as we sit here today it seems
5 A Just in case if we have any issue, so	5 like you may not remember receiving it, but are you
6 right away can call.	6 disputing that you received it?
7 Q So you're saying tenants, guests at the	7 A No, I received that. But I am not
8 hotel can help; is that what you're saying?	8 remember that because it '18. I do receive couple
9 A Of course, sometimes, yes, they mention	9 of those emails, yes.
10 us. They mention us, so we tell officers also.	10 Q As we sit here today, do you remember
11 Q I'm handing you what was Plaintiff's	11 receiving this email?
12 Exhibit 10 to Mr. Shareef's deposition. This will	12 A No, I don't remember.
13 be Plaintiff's Exhibit 10 to your deposition as	13 Q There's an attachment to that email,
14 well, Mr. Islam. And it is Bates stamped NBI 3097	14 correct?
15 to 3098. You see that, Mr. Islam?	15 A Yes, sir.
16 A Yes, I see that.	16 Q And you're holding that
17 Q Do you see it?	17 A Yeah.
18 A Yes.	18 Q it is part of Plaintiff's Exhibit 10.
19 Q So that's Plaintiff's Exhibit 10. And	19 A Yeah.
20 that email is from an Investigator Tim Wade.	20 Q That came with the email, right
21 A Uh-huh (affirmative).	21 A Yes.
22 Q Do you see that with Rockdale County	22 Q from Investigator Wade. You agree
23 Sheriff's Office?	23 with that?
24 A Yes, I see.	24 A Yes, sir.
25 Q And it is addressed to you, is it not?	25 Q And the attachment is a notice of missing

5 (Pages 132 - 135)

	A.G. v. Northbrook Industries,	ПС	. d/b/a United Inii and Suites	
	Page 136		Page 138	
1	person. You see that?	1	addressed, yes. But I am not exactly I not	
2	A Uh-huh (affirmative).	2	remember that specific one, yeah.	
3	Q You agree?	3	Q It seems as if he somehow knows you	
4	A Yes, sir.	4	because he refers to you personally, he says Ashar?	
5	Q And the attachment has a photo on it,	5	A Yeah, maybe he come often and talk to me,	
6	correct?	6	yes, yes.	
7	A Yes.	7	Q But you do not recall	
8	Q And it indicates the age, race, gender,	8	A I don't recall, yes, sir.	
9	height, weight of that missing person, correct?	9	Q Do you remember anybody else at the	
10	A Yes.	10	hotel, whether it was Mr. Shareef or somebody else,	
11	Q And the name of	11	talking with an Investigator Wade about J.G.?	
12	A Yes.	12	A I'm not sure.	
13	Q the missing person too?	13	Q Mr. Islam, I take it the answer is no,	
14	A Yes.	14	but did you hold a staff meeting and talk about	
15	Q And you see it says J.G., age 16, 5-7?	15	this notice that you had received?	
16	A Yeah.	16	A Not exactly the staff meeting. Actually	
17	Q Weight, black, so on and so forth?	17	whenever somebody come after my shift, I discuss	
18	A Uh-huh (affirmative).	18	with them, okay, there's some things there's	
19	Q Do you remember seeing this notice?	19	somebody left that and this is behind the counter.	
20	A I don't recall that. But I do see do	20	If you see anybody like that or if you see anybody	
21	got those messages by email, but I'm not exactly	21	1 under this name, so there's a number underneath,	
22	remember that specific one.	22	2 you can call them or let me know if you see any	
23	Q You do not remember receiving this	23	23 kind of information regarding that person, yes.	
24	notice?	24	Q So when you finish your shift, you would	
25	A I don't remember, yeah.	25	provide a notice like that to whoever was taking	
	Page 137		Page 139	
1	Q Again, you're not disputing that you did	1	over at the front desk?	
2	receive it?	2	A Yeah. If we have like hard copies, yes.	
3	A No, I'm not disputing it.	3	Usually we just put in the back of our office so	
4	Q You're just saying I don't		the customer don't see directly, but our office	
5	A I don't		staff can see those persons so they can let us	
6	Q remember receiving it?		know, maybe the housekeepers or maintenance or	
7	A remember.		whoever. That's the only people who able to see	
8	Q Then I assume but tell me if I'm		that picture, not the customers.	
9	wrong I assume that you do not remember what you		Q But if I'm understanding correctly, you	
	did after receiving this; is that correct?		wouldn't have a staff meeting where you call	
11	A Maybe when I received that I just check		everybody in and you say okay, I want everybody to	
12	those that tenant list and yes. But I don't		be aware that we just received an email from this	
1	remember what respond I did at that time, yeah.		investigator in Rockdale County about a missing	
14	Q You do not remember what you did in		16-year-old girl suspected to be at our hotel, here	
	response		is her photo, I want everybody to be looking for	
16	A Yeah.		this girl. If you see her, please immediately	
17	Q to that notice, correct?	17		
18	A Yeah.	18	A Yeah, basically	
19	Q Do you remember communicating with	19	Q Did any meeting like that happen?	
	Investigator Wade?	20	MR. UNDERRINER: Object to form.	
21	A No, I don't remember.	21	A No, not like meeting, meeting. But we	
22	Q Do you remember him visiting the hotel?		put that whenever we put those flyer on that	
23	A Not exactly that one. But there is like		wall, it means does everybody have to they	
24	a couple of investigator and officers come and talk		24 already know what to do if that's what we discuss,	
25 to me, and I tell them whatever need to be			5 not specifically for that person, but whenever we	

6 (Pages 136 - 139)

A.G. v. Northbrook Industries, Inc. d/b/a United Inn and Suites			
Page 140	Page 142		
1 got any kind of notice like that, so we put on that	1 I think that's what we would have done but I'm not		
2 wall so everybody knows what is why this is	2 sure?		
3 there.	3 A Yeah, I'm not sure.		
4 Q Describe the wall to me. What's hanging	4 Q You don't have a specific memory of		
5 on the wall?	5 putting it on the wall?		
6 A Well, basically this is behind the	6 A Exactly this one, yeah. But we put those		
7 office. So there's like where we punch our	7 over there, yeah.		
8 timecards, so that's the wall where we have	8 Q I would have been surprised if you had a		
9 where we put all those kind of like notices or	9 specific memory of putting it on the wall.		
10 anything need to be addressed to anybody to	10 A Yeah.		
11 everybody, we just put that over there so whenever	11 Q It sounds, if I'm hearing your testimony,		
12 anybody come, any person punch a time card will see	12 that you have gotten missing persons reports		
13 those notices. And if they have any question, they	13 before?		
14 talk to me or whoever is on the shift.	14 A Yes, sir.		
15 Q How many items would you say are hanging	15 Q Is it common in your experience for those		
16 on the wall?	16 reports to concern minors or is that uncommon?		
17 A Mostly those missing persons paperwork	17 MR. UNDERRINER: Object to form.		
18 and sometime we have some like wanted pictures from	18 A What your exact question is?		
19 the DeKalb County or the other counties also and	19 BY MR. BOUCHARD:		
20 anything what we want to tell those our	20 Q Do the missing persons reports that you		
21 employees or like our co-workers so we can make a	21 have seen since you have worked at United Inn and		
22 copy of the IDs and put it there just in case	22 Suites typically concern minors?		
23 somebody see that person, that person damage	23 A Minors?		
24 anything or that person is not allowed on this	24 Q People under the age of 18.		
25 property like a DNR list thing, yes.	25 A Sometime I suppose so, yeah.		
Page 141	Page 143		
1 Q So are there two or three pictures on the	1 Q Is it 50/50? Is it more common that		
2 wall or is it a wall with	2 they're adults?		
3 A Wall with	3 MR. UNDERRINER: Object to the form.		
4 Q many pictures?	4 A I am not exactly sure 50/50. But there		
5 A Wall with I can say more than two, three,	5 are sometime the elderly person also and the kids		
6 four pictures.	6 also, yes.		
7 Q More than ten?	7 BY MR. BOUCHARD:		
8 A Yes. If you talking about the driving	8 Q They can come in all ages?		
9 license, driving licenses, yes, more than ten,	9 A Yes.		
10 yeah.	10 Q I didn't know		
11 Q More than 20?	11 A Missing missing person, yes.		
12 A Maybe 20, yeah.	12 Q I didn't know if one was more common than		
13 Q So 20 photos on the wall?	13 another. I would think for example, Mr. Shareef,		
14 A Yes, sir. Yes, sir. I'm talking about	14 that a missing child might be less common than a		
15 the driving license.	15 missing adult because adults have cars and means of		
16 Q Well, I'm talking about the wall that	16 getting away and other things that kids often		
17 you're saying	17 don't.		
18 A Yes.	18 A Mostly		
19 Q this photo would have been put on.	MR. UNDERRINER: Object to the form,		
20 A Yeah, this photo	20 there's no question pending.		
21 Q There would have been about 20 or more	21 A Mostly I can say youngsters I can say.		
22 photos on that wall?	22 BY MR. BOUCHARD:		
23 A Yes. Yes.	23 Q Most of the missing persons reports that		
24 Q And are you sure that this notice was put	24 you have seen generally concern younger people?		
25 on that wall or are you saying maybe it was because	25 A Younger people, yeah.		
, , , , , , , , , , , , , , , , , , , ,	U 1 1 / V		

7 (Pages 140 - 143)

A.G. V. Northbrook industries,	inc. d/b/a United inn and Suites		
Page 144	Page 146		
1 Q Showing you Plaintiff's Exhibit 28 which	1 at 2:00 a.m., you typically didn't work the		
2 is Bates stamped NBI 4105 to 4110. And Mr. Islam,	2 overnight shift		
3 these are text messages I believe them to be	3 A Yeah, they let		
4 between you and Sergeant Weber. Have you had a	4 Q if I understood you?		
5 chance to review that, sir?	5 A Yeah, they let the night		
6 A That's the only message, right?	6 Q Hold on. Sorry. Let me		
7 Q Well, that's really I'm not even going to	7 A I'm sorry.		
8 ask you about the substance	8 Q If I understood your testimony in		
9 A Yeah.	9 February, you typically didn't work the overnight		
10 Q of any of the messages. My question	10 shift; is that correct?		
11 really is is that all of the messages between you	11 A I did some work nighttime also but not		
12 and Sergeant Weber from 2017 to 2019?	12 every night.		
13 A I'm not sure. May be some more. I'm not	13 Q Was it typical for you to work the		
14 exactly sure.	14 10:00 p.m. to 6:00 a.m. shift from 2017 to 2019?		
15 Q Well, it looks like I don't have the	15 A Yeah, in the morning, yes.		
16 document in front of me but it look like three	16 Q It was typical to work 10:00 p.m. to		
17 or four or five text messages between you and	17 6:00 a.m.?		
18 Sergeant Weber from the year 2017 to 2019; is that	18 A Yes, in the morning, morning time I work.		
19 correct?	19 But whenever somebody don't showed up, I working		
20 A Uh-huh (affirmative).	20 night also.		
21 Q Does that seem accurate to you? Does	21 Q And they would call you during their		
22 that surprise you?	22 shift or after their shift		
23 A No. Maybe usually I actually call him	23 A Yes.		
24 and I leave actually message or maybe I think he's	24 Q to report?		
25 sleeping or maybe he get up from the job and then I	25 A To report?		
Page 145	Page 147		
1 message him. Otherwise I just call him and tell	1 Q To report what they had seen at the		
2 him whatever the problem is or if he can guide me	2 property.		
3 or I can call 911 and then I can talk to Weber	3 A Yeah. Whenever I go back to that to		
4 that's what happened yesterday and I call and I can	4 the office, so whoever working nighttime, so they		
5 check whatever the situation is now, yeah.	5 tell us or they tell me, yeah, what happened last		
6 Q So would it be common for you to send	6 night and what I did.		
7 text messages to Sergeant McClelland?	7 Q And I meant to ask you a few more		
8 MR. UNDERRINER: Object to the form.	8 questions about the missing person report for J.G.,		
9 A No. I usually most of the time if I	9 Mr. Islam. You said you weren't sure if you posted		
10 text, I text Mr. Weber. Rarely send messages to	10 the photo of J.G. on the wall that you were		
11 Mr. McClelland. I just call.	11 describing. Do you recall taking any steps at all		
12 BY MR. BOUCHARD:	12 in response to receiving that notice?		
13 Q Did you text officer McClelland?	13 A I don't recall the specific that one.		
14 A Maybe one or two times. I'm not exactly	14 Q But there's no email that I have seen		
15 sure.	15 where you respond to Investigator Wade. You don't		
16 Q Generally speaking you would call them?	16 recall responding to him, do you?		
17 A Call them.	MR. UNDERRINER: Object to form.		
18 Q You would not text them?	18 A I'm not sure.		
19 A Yeah. Most of the time, yeah.	19 BY MR. BOUCHARD:		
20 Q And they would not submit written reports	20 Q If there were an email, I assume it would		
21 to you of what had happened during their four-hour	21 have been produced; is that correct?		
22 shifts, correct?	22 A Maybe. But I'm not sure about responding		
23 A No. They like submit like a physical	23 to him.		
24 report, no.	24 Q Take a look at Plaintiff's Exhibit 29		
25 Q And if they're clocking out so to speak	25 which is NBI 625 to 631. Have you seen this		

8 (Pages 144 - 147)

Page 148 Page 150	A.G. v. Northbrook Industries, Inc. d/b/a United Inn and Suites			
1 document before, Mr. Islam? 2 A Yes, I think I read that before. I'm not 3 exactly sure about this whole thing. But some of 4 them I saw before, those paperwork. Just they kind 5 of understanding what the human trafficking is and 6 what we have to do, yeah. 7 Q Do you know where you saw it? 8 A In the office, yeah. 9 Q Where? 10 A My office. 11 Q Where in your office though? 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office, In a filing cabiner? On your 15 desk? On a computer? 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 14 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 2 A No go it is just sort of like a cubby system 19 or shelf system? 20 A Y Cah. 3 A Yeah, on the shelf and maybe we have that 4 Q Sone bills? 4 A Yean the mails and stuff and so me and the other 17 of that. 5 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 4 In a cabinet also, the file cabinet where we put	Page 148	Page 150		
2 to the staff; is that correct? 3 caxetly sure about this whole thing. But some of 4 them I saw before, those paperwork. Just they kind 5 of understanding what the human trafficking is and 6 what we have to do, yeah. 7 Q Do you know where you saw it? 8 A In the office, yeah. 9 Q Where? 10 A My office. 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where it in the back office, yeah. 14 Q Day on a table in the back office on the 17 table. Yeah. 15 Q On a table in the back office on the 17 table. Yeah. 16 A A table also, in the back office? 17 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 22 two files and the sark of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? A A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 14 Q Some bills? A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. B Q So it is just sort of like a cubby system 19 or shelf system? O A Yeah. 2 to the staff; not the whole staff; no. 4 A To the staff; not the whole staff; no. 5 A Not just distributing that hard copies. 6 but we just discuss with the other co-workers like the table this kind of things are going on so just keep an 8 eye on that. If you see somebody like those 11 markerial, yeah. Training material, whatever the 11 mewsletter hings ometimes, yeah. 12 Q Id off know what your tealking about. 13 What is the newsletter hings ometimes, yeah. 14 A Newsletter bings ometimes, yeah. 15 what is the newsletter hings ometimes, lead to the beast office or the search office. 16 crimes are going on in that tr	-	_		
3 A To the staff, no the whole staff, no. 4 them I saw before, those paperwork. Just they kind 5 of understanding what the human trafficking is and 6 what we have to do, yeah. 9 Q Where? 10 A My office. 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office, land a land is the back office on the 17 table. Yeah. 18 Q On a table in the back office on the 17 table. Yeah. 29 Q What was the purpose of the table? 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with one document on it 6 that says about human trafficking is wand 12 Q How many documents are on the table? 2 A No, that's like a regular table where we operate the oc-worker can see and read that if you have any 11 kind of like information like that. Yeah. 2 Q How many documents are on the table? 3 A Some mails. 4 Q Some bills? 4 A Wash. 5 La To the staff, no the whole staff, no. 4 Did you play – go ahead, sir. 5 but we just discuss with the other copins on so just keep an 8 eye on that. If you see somebody like those 9 things, whatever, is I read on that training 11 material, value. It his kind of this, swhatever, is I read on that training 12 Q Id hort know what you're talking about. 13 What is the newsletter thing? 14 A Newsletter sometimes like on the news, we bave to 17 aware of that. Or sometime the DeKalb County like 18 circines are going on in that area, so we have to 17 aware of that. Or sometime the DeKalb County like 18 circines are going on in that area, so we have to 17 aware of that. Or sometime the DeKalb County like 18 circines are going on in that area, so we have to 19 group is like they are robbing people and they are 20 doing something bad, so we tell the other 21 co-workers to keep a				
4 hem I saw before, those paperwork. Just they kind 5 of understanding what the human trafficking is and 6 what we have to do, yeah. 7 Q Do you know where you saw it? 8 A In the office, yeah. 9 Q Where? 10 A My office. 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where it in the back office? In a filing cabinet? On your 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office on the 18 A Rost office, h-thuh (affirmative), 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 3 it? 4 A Yeah, it — 1 Q Can you describe the table for me, 24 what is the new like training material, something 25 ike that. 1 Q Can you describe the table for me, 24 what is the new like training material, something 24 what is the new like training material, something 25 ike that. 1 Q Can you describe the table for me, 20 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it — 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 17 of that. 1 Q How many documents are on the table? 2 A Mails Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 8 Q Soi it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 22 L Q Id and it was it the other 21 co-workers to keep an eye on them, don't let 2 co-workers to keep an eye on them, don't let 2 co-workers to keep an eye on them, don't let 2 co-workers to keep an eye on them, don't let 2 co-workers to keep an eye on them, don't let 2 co-workers to keep an eye on them, don't let 2 co-workers to keep an eye on them, don't let 2 co-workers t		·		
5 of understanding what the human trafficking is and 6 what we have to do, yeah. 7 Q Do you know where you saw it? 8 A In the office, yeah. 9 Q Where? 10 A My office. 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office? 14 in the back office? 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the other 12 table. Yeah. 18 A No., that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-workers can see and read that if you have any 11 kind of like information like that. Yeah. 19 A Some mails. 10 Q Can you describe the table? 11 Q How many documents are on the table? 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 16 Q Ond it would be on one of the shelves, is 22 that what you're saying? 17 Q And it would be on one of the shelves, is 22 that what you're saying? 28 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put and the mails and stuff and maybe we have that 24 in a cabinet also, the file cabinet where we put and the mails and stuff and the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put and the mails and stuff and the public of the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put and the mails and stuff and the public of the public of the public of the public of the p	1	· · · · · · · · · · · · · · · · · · ·		
6 what we have to do, yeah. 7 Q Do you know where you saw it? 8 A In the office, yeah. 9 Q Where? 10 A My office. 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office on the 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, wh-thu (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and at what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it— 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 17 table? 2 Q How many documents are on the table? 3 A Some mails. 4 Q Some bills? 4 A No, that's like a regular table where we put all the mails and stuff and so me and the other table? 3 A Some mails. 4 Q Some bills? 5 A Mails. Mail, daily mail. Daily mail in 6 one shelf and we have like table like shelf on top 17 of that. 8 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 24 in a cabinet also, the file cabinet where we put 25 like to the cabinet where we put 26 like that. Page 149 1 A No. 12 Q Do you know where these materials came 3 from? 9 A No, not exactly. 10 Q Some bills? 1 A No. 2 Q Do you know. Do you know where they 2 to the united Inn of sure who nay review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account dad in that acc				
7 disk kind of things are going on so just keep an 8 eye on that. If you see somebody like those 9 things, whatever, is I read on that training 10 material, yeah. Training material, whatever the 11 newsletter thing sometimes, yeah. 12 Q I don't know what you're talking about. 13 Q Can you describe that for me, sir, where 14 in the back office, Pan a filing cabinet? On your 15 desk? On a computer? 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 17 table. Yeah. 18 Q On a table in the back office on the 18 Q On a table in the back office on the 19 A Back office, uh-huh (affirmative). 19 A Back office, uh-huh (affirmative). 19 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. 19 group is like they are robbing people and they are 20 doing something bad, so we tell the other 21 co-workers to keep an eye on them, don't let 22 anybody do this and these are some of the IDs are 23 there, so don't check them in. 24 Q Did you play any role in preparing this 25 document, Mr. Islam? 11 A No. 2 Q Do you know where these materials came 3 from? 12 A No, that's like a regular table where we put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 19 Or shelf system? 19 Q A Mol it would be on one of the shelves, is 22 that what you're saying? 19 A Yeah, on the shelf and maybe we have that 44 in a cabinet also, the file cabinet where we put 19 the part of the control of the shelves, is 20 that what you're saying? 19 Q I had it would be on one of the shelves, is 20 that what you're saying? 19 Q I had it would be on one	_			
8 A In the office, yeah. 9 Q Where? 1 A My office. 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, wh-thu (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. 19 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it — Page 149 1 Q Can you describe the table for me, 2 What is the new like training material, something 25 like that. 10 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 7 of that. 16 Q So it is just sort of like a cubby system 19 or shelf system? 19 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 22 A Yeah. 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 11 like fails and maybe we have that 24 in a cabinet also, the file cabinet where we put 12 like to pour back office on the 12 like mails and stuff and maybe we have that 14 row of the 2 like that 15 like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, i		,		
9 Where? 10 A My office. 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 16 dask? On a computer? 17 table. Yeah. 18 Q On a table in the back office on the 18 Q On a table in the back office? 19 A Back office, wh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it— 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 7 of that. 16 Q So it is just sort of like a cubby system 19 or shelf system? 19 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 21 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we untertail, whatever the 11 newsletter things? 16 C rimes are going on in that arca, so we have to 17 aware of that. Or sometimes like on the news, we 15 have sometimes like on the news, we 15 have sometimes like the the we sowe like a new – like that kind of like in the beak office on the 12 aware of that. Or sometime				
10 material, yeah. Training material, whatever the 11 Q Where in your office though? 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 16 A A table also, in the back office? 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A I twas a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and it? 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 3 ir? 4 A Yeah, it— 5 Q Is it a table with a stack of paper on it? 6 that says about human trafficking? What is the rable? 8 A No, that's like a regular table where we put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 A Nails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top or of that. 15 Q So it is just sort of like a cubby system 19 or shelf system? 20 A A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 21 A I was a table so we know what is those are some of the IDs are 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something bad, so we tell the other 2d oling something				
11 newsletter thing sometimes, yeah. 12 A In the back office, yeah. 13 Q Can you describe that for me, sir, where 14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? Page 144 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 21 A Yeah, on the shelf and maybe we have that 22 Understood. But was it your typical 23 A Yeah, on the shelf and maybe we have that 24 understood in the active thing? 24 has been well at that sow met was the same some like a new like that kind of like 25 doing and that area, so we have to 26 doing something bad, so we tell the other 21 co-workers to keep an eye on them, don't let 22 ampbody do this and these are some of the IDs are 23 there, so don't check them in. 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 149 A N A Maybe some training company or maybe 25 Mr. Shareef. 26 Q Im not asking to you speculate. Im 27 just asking if you know. Do you know where they 28 came from? 29 Leain with FBI Agent K.J. Strickland. It looks 21 like it is prim				
12	1	-		
13 What is the newsletter thing? 14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 ir? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? A No, that's like a regular table where we put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 What is the newsletter thing? 14 A Newsletter sometimes like on the news, we 15 have some like anew like that kind of like 16 crimes are going on in that area, so we have to 17 aware of that. Or sometime be DeKalb County like 18 motels, they discuss with each other that this 19 group is like that. Or sometime be DeKalb County like 18 motels, they discuss with each other that this 19 group is like that. Or sometime be DeKalb County like 11 a Nos. 22 doing something bad, so we tell the other 22 to-workers to keep an eye on them, don't let 22 amybody do this and these are some of the IDs are 23 there, so don't check them in. 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 149 1 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickla				
14 in the back office? In a filing cabinet? On your 15 desk? On a computer? 15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. 18 Q Can you describe the table for me, 3 it? 19 A Yeah, it	, ,			
15 desk? On a computer? 16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 4 what is the new like training material, something 25 like that. 10 Q Can you describe the table for me, 3 it? 21 A Yeah, it — Page 149 22 Q Is it a table with none document on it 6 that says about human trafficking? What is the 7 table? 28 A No, that's like a regular table where we put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q Bow me mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 6 one shelf and we have like table like shelf on top 17 of that. 15 A Yeah, or the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 41 m a cabinet also, the file cabinet where we put 42 in a cabinet also, the file cabinet where we put 42 in a cabinet also, the file cabinet where we put 42 in a cabinet also, the file cabinet where we put 42 in a cabinet also, the file cabinet where we put 44 in a cabinet also, the file cabinet where we put 45 in the file cabinet where we put 46 in a cabinet also, the file cabinet where we put 47 in a cabinet also, the file cabinet where we put 48 in a cabinet also, the file cabinet where we put 49 in a cabinet also, the file cabinet where we put 40 in a cabinet also, the file cabinet where we put 40 in a cabinet also, the file cabinet where we put 40 in a cabinet also, the file cabinet where we put 40 in a cabinet also, the file cabinet where we put 41 in a cabinet also, the file cabinet where we put 41 in a cabinet also, the file cabinet where we put 42 in a cabinet also, the file cabinet where we put 42 in a cabinet also, the file cabine where we put 42 in a cabinet also, the file cabinet where we put				
16 A A table also, in the back office on the 17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 21 type of like awareness about anything. Like 22 assometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 15 A A Mails. Mail, daily mail. Daily mail in 6 one shelf and we have like table like shelf on top or shelf system? 20 A Yeah. 11 Q And it would be on one of the shelves, is 22 that what you're saying? 21 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 10 Co-worker can see and read that if you have any or shelf system? 21 Q And it would be on one of the shelves, is 22 that what you're saying? 22 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 10 Co-worker can see and read that if you have any or the table? 21 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put				
17 table. Yeah. 18 Q On a table in the back office? 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? A Yeah, it — Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker to keep an eye on them, don't let 22 anybody do this and these are some of the IDs are 23 there, so don't check them in. 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 149 1 A No. 2 Q Do you know where these materials came 3 from? 4 A Yeah, it — 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker to keep an eye on them, don't let 22 anybody do this and these are some of the IDs are 23 there, so don't check them in. 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 151 1 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Sharreef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and Irm not sure who may review that 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 Q Is it y	_			
18 Motels, they discuss with each other that this 19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it — 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails, Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 tin a cabinet also, the pide cables. 25 document, Mr. Islam? 26 don't check them in. 26 Q Did you play any role in preparing this 26 document, Mr. Islam? 27 Do you know where these materials came 28 from? 29 Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 Cchain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef both have access 17 to the United Inn Gmail account? 14 A Yes. 15 Q Is it your routine practice 2017 through 16 Cacount. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 Understood.				
19 A Back office, uh-huh (affirmative). 20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 151 1 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yeah. 20 Understood. But was it your typical 21 A Yes, Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during		·		
20 Q What was the purpose of the table? 21 A It was a table so we know what is those 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 uhat is the enw like training material, something 25 anybody do this and these are some of the IDs are 26 anybody do this and these are some of the IDs are 27 anybody do this and these are some of the IDs are 28 anybody do this and these are some of the IDs are 29 anybody do this and these are some of the IDs are 20 anybody do this and these are some of the IDs are 24 anybody do this and these are some of the IDs are 25 anybody do this and these are some of the IDs are 26 anybody do this and these are some of the IDs are 26 anybody do this and these are some of the IDs are 27 anybody do this and these are some of the IDs are 28 anybody do this and these are some of the IDs are 29 Did you play any role in preparing this 24 Q Did you play any role in preparing this 25 document, Mr. Islam? 1 A No. 2 Q Do you know where these materials came 3 from? 1 A No. Os Page 151 1 A No. 2 Q Im not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came				
21 Co-workers to keep an eye on them, don't let 22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 4 what is the new like training material, something 25 like that. Page 149 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 to Did you play any role in preparing this 25 document, Mr. Islam? 24 Q Did you play any role in preparing this 25 document, Mr. Islam? 24 Q Do you know where these materials came 3 from? 4 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical				
22 type of like awareness about anything. Like 23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 Page 149 Page 151 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 Q Did you play any role in preparing this 25 that here, so don't check them in. 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 151 1 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking it you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes, Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during				
23 sometime our system, how we operate the system and 24 what is the new like training material, something 25 like that. Page 149 Page 149 Page 151 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top or shelf system? 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 2 that what you're saying? 21 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 22 that what is the new like training material, something 24 do Did you play any role in preparing this 25 document, Mr. Islam? 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 151 1 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 1 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But was it your typical 24 practice to review emails in that account during				
24 what is the new like training material, something 25 like that. Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it — 3 from? 4 A Yeah, it — 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 2 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 24 Q Did you play any role in preparing this 25 document, Mr. Islam? Page 151 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes, Yes, I do. But was it your typical 24 practice to review emails in that account during	1 7 7	, ,		
25 document, Mr. Islam? Page 149 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put Page 151 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	·			
Page 149 1 Q Can you describe the table for me, 2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put Page 151 1 A No. 2 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during				
1	Page 1/40			
2 Mr. Islam. Is it a table with a stack of paper on 3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 or shelf system? 19 or shelf system? 19 Or A Yeah. 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 21 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 22 Q Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where these materials came 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where these materials came 3 from? 9 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	_	-		
3 it? 4 A Yeah, it 5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 3 from? 4 A Maybe some training company or maybe 5 Mr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	I -	2 Q Do you know where these materials came		
5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 SMr. Shareef. 6 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put	_ = =	-		
5 Q Is it a table with one document on it 6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we 9 put all the mails and stuff and so me and the other 10 Q I'm not asking to you speculate. I'm 11 just asking if you know. Do you know where they 12 Q I'm not asking to you speculate. I'm 13 just asking if you know. Do you know where they 14 Same from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	4 A Yeah, it	4 A Maybe some training company or maybe		
6 that says about human trafficking? What is the 7 table? 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 Q I'm not asking to you speculate. I'm 7 just asking if you know. Do you know where they 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put				
7 just asking if you know. Do you know where they 8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during		6 Q I'm not asking to you speculate. I'm		
8 A No, that's like a regular table where we 9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 8 came from? 9 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during				
9 put all the mails and stuff and so me and the other 10 co-worker can see and read that if you have any 11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 29 A No, not exactly. 10 Q Showing you Plaintiff's Exhibit 5 which 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	8 A No, that's like a regular table where we			
11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 A Yeah. 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put	9 put all the mails and stuff and so me and the other	9 A No, not exactly.		
11 kind of like information like that. Yeah. 12 Q How many documents are on the table? 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 A Yeah. 11 is Bates stamped NBI 2554 to 2555. It is an email 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 24 practice to review emails in that account during	10 co-worker can see and read that if you have any	10 Q Showing you Plaintiff's Exhibit 5 which		
12 Chain with FBI Agent K.J. Strickland. It looks 13 A Some mails. 14 Q Some bills? 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 10 A Yeah. 20 And it would be on one of the shelves, is 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 12 chain with FBI Agent K.J. Strickland. It looks 13 like it is primarily between Mr. Shareef and Agent 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	11 kind of like information like that. Yeah.			
14 Q Some bills? A Mails. Mail, daily mail. Daily mail in 15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 19 Q Is it your routine practice 2017 through 20 A Yeah. 20 Q And it would be on one of the shelves, is 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 14 Strickland. But I believe it is to the United Inn 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	12 Q How many documents are on the table?			
15 A Mails. Mail, daily mail. Daily mail in 16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 19 A Yeah. 20 A A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 15 Gmail account and I'm not sure who may review that 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	13 A Some mails.	13 like it is primarily between Mr. Shareef and Agent		
16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 19 Q A Yeah. 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	14 Q Some bills?	,		
16 one shelf and we have like table like shelf on top 17 of that. 18 Q So it is just sort of like a cubby system 19 or shelf system? 19 Q A Yeah. 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 16 account. Do you and Mr. Shareef both have access 17 to the United Inn Gmail account? 18 A Yes. 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	15 A Mails. Mail, daily mail. Daily mail in	15 Gmail account and I'm not sure who may review that		
17 to the United Inn Gmail account? 18 Q So it is just sort of like a cubby system 19 or shelf system? 19 Q Is it your routine practice 2017 through 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 27 to the United Inn Gmail account? 28 A Yes. 29 Understood. But sometimes I miss 20 Understood. But was it your typical 20 Understood. But was it your typical 21 practice to review emails in that account during		,		
19 or shelf system? 20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 19 Q Is it your routine practice 2017 through 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	17 of that.	-		
20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	18 Q So it is just sort of like a cubby system	18 A Yes.		
20 A Yeah. 21 Q And it would be on one of the shelves, is 22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 20 2019 to review emails in that account? 21 A Yes. Yes, I do. But sometimes I miss 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	19 or shelf system?	19 Q Is it your routine practice 2017 through		
22 that what you're saying? 23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 22 those, yeah. 23 Q Understood. But was it your typical 24 practice to review emails in that account during	20 A Yeah.			
23 A Yeah, on the shelf and maybe we have that 24 in a cabinet also, the file cabinet where we put 23 Q Understood. But was it your typical 24 practice to review emails in that account during	21 Q And it would be on one of the shelves, is	21 A Yes. Yes, I do. But sometimes I miss		
24 in a cabinet also, the file cabinet where we put 24 practice to review emails in that account during	22 that what you're saying?	22 those, yeah.		
	23 A Yeah, on the shelf and maybe we have that	23 Q Understood. But was it your typical		
25 all those like training material. 25 those years?	24 in a cabinet also, the file cabinet where we put	24 practice to review emails in that account during		
	25 all those like training material.	25 those years?		

9 (Pages 148 - 151)

A.G. v. Normbrook mausures,	Inc. d/b/a United Inn and Suites
Page 152 1 A Yes, sometime, yeah. 2 Q Do you recall talking to, communicating 3 with, or meeting FBI Agent Strickland? 4 A I don't remember. 5 Q You said you do not remember? 6 A I don't remember. 7 MR. BOUCHARD: We can go off the record. 8 THE VIDEOGRAPHER: Off the record at 9 5:49 p.m. 10 (Recess 5:49-5:57 p.m.) 11 THE VIDEOGRAPHER: Back on the record at 12 5:57 p.m. 13 MR. BOUCHARD: Mr. Islam, thank you. 14 That concludes my questioning. 15 THE WITNESS: Thank you, sir. 16 THE VIDEOGRAPHER: Off the record at 17 5:57 p.m. 18 (Deposition concluded at 6:00 p.m.) 19 (Signature reserved) 20 21 22 23	Page 154 1 - Password-Protected Access: Transcripts and exhibits relating to this proceeding will be 2 uploaded to a password-protected repository, to which all ordering parties will have access. 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23
24	24
25	25
Page 153 1 The following reporter and firm disclosures were presented by me at this proceeding for review 2 by counsel: 3 REPORTER DISCLOSURES 4 The following representations and disclosures are made in compliance with Georgia Law, more 5 specifically: Article 10 (B) of the Rules and Regulations of 6 the Board of Court Reporting (disclosure forms) OCGA Section 9-11-28 (c) (disqualification of 7 reporter for financial interest) OCGA Section 15-14-37 (a) and (b) 8 (prohibitions against contracts except on a case-by-case basis). 9 - I am a certified court reporter in the State of 10 Georgia I am a subcontractor for Veritext Legal 11 Solutions I have been assigned to make a complete and 12 accurate record of these proceedings I have no relationship of interest in the matter 13 on which I am about to report which would disqualify me from making a verbatim record or 14 maintaining my obligation of impartiality in compliance with the Code of Professional Ethics. 15 - I have no direct contract with any party in this action, and my compensation is determined solely by 16 the terms of my subcontractor agreement. 17 FIRM DISCLOSURES 18 - Veritext Legal Solutions was contacted to provide reporting services by the noticing or taking 19 attorney in this matter There is no agreement in place that is prohibited 20 by OCGA 15-14-37 (a) and (b). Any case-specific discounts are automatically applied to all parties, 21 at such time as any party receives a discount Transcripts: The transcript of this proceeding 22 as produced will be a true, correct, and complete record of the colloquies, questions, and answers as 23 submitted by the certified court reporter Exhibits: No changes will be made to the 24 exhibits as submitted by the reporter, attorneys, or witnesses.	Page 155 1 CERTIFICATE 2 STATE OF GEORGIA: COUNTY OF FULTON: 3 4 I hereby certify that the foregoing transcript was taken down to the best of my ability, as stated 5 in the caption, and the colloquies, questions and answers were reduced to typewriting under my 6 direction; that the transcript is a true and correct record of the evidence given upon said 7 proceeding. I further certify that I am not a relative or 8 employee or attorney of any party, nor am I financially interested in the outcome of this 9 action. I have no relationship of interest in this 10 matter which would disqualify me from maintaining my obligation of impartiality in compliance with 11 the Code of Professional Ethics. I have no direct contract with any party in 12 this action and my compensation is based solely on the terms of my subcontractor agreement. 13 Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve 14 all parties as an impartial officer of the court. 15 This the 12th day of May 2023. 16 17 18 **Manufacture** **LEAVIS BROWER, CAS-B-1401** 19 20 21 22 23 24 25

10 (Pages 152 - 155)

		Page 156		Page 158
1	DEPOSITION ERRATA SHEET	1 480 100	1 Page Line Change	<u> </u>
	To: Dana Richens, Esq., drichens@sgrlaw.com		2	
	Re: Signature of Deponent: Ashar Islam Date Errata due back at our offices: 30 Days		3 Reason for change:	
5	Dute Estata due back at our offices. 30 Days			
	Greetings:		4 Page Line Change	
7	This deposition has been requested for read and		5	
0	sign by the deponent. It is the deponent's		6 Reason for change:	
9	responsibility to review the transcript, noting any		7 Page Line Change	
10	changes or corrections on the attached PDF Errata.		8	
10	The deponent may fill out the Errata electronically or print and fill out manually.		9 Reason for change:	
11	or print and the out mandally.		10 Page Line Change	
12			11	
12	Once the Errata is signed by the deponent and			
13	notarized, please email it to the offices of Veritext (below).		12 Reason for change:	
14	(click (celow))		13 Page Line Change	
15			14	
16	When the signed Errata is returned to us, we will		15 Reason for change:	
10	seal and forward to the taking attorney to file with the original transcript. We will also send		16 Page Line Change	
17	copies of the Errata to all ordering parties.		17	
18	Ted to IF and the second second		18 Reason for change:	
19	If the signed Errata is not returned within the time above, the original transcript may be filed		19	
20	with the court without the signature of the			
	deponent.		20 Deponent's Signature	
21			21 Sworn to and subscribed before me this day of	
22	Please send completed Errata to:		22	
23	Veritext Production Facility		23	
	20 Mansell Court, Suite 300			
24	Roswell, GA 30076		24 Notary Public	
25	(770) 343-9696 cs-southeast@veritext.com		25 My Commission Expires:	
			7 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
1	EDDATA C ACCICNIMENT. ATL 5007010	Page 157		
	ERRATA for ASSIGNMENT: ATL 5897010			
_	I, the undersigned, do hereby certify that I have read the transcript of my testimony, and that:			
3	· · · · · · · · · · · · · · · · · · ·			
	There are no changes noted.			
4	<u> </u>			
	The following changes are noted:			
5				
6	Pursuant to Rule 30(7)(e) of the Federal Rules of			
7	Civil Procedure and/or OCGA 9-11-30(e), any changes			
/	in form or substance which you desire to make to your testimony shall be entered upon the deposition			
Q	with a statement of the reasons given for making			
0	them. To assist you in making any such			
9	corrections, please use the form below. If			
	additional pages are necessary, please furnish same			
10	and attach.			
11				
	Page Line Change			
	December of the second			
	Reason for change: Page Line Change			
	Page Line Change			
	Reason for change:			
	Page Line Change			
20	Reason for change:			
	Reason for change: Page Line Change			
21 22	Page Line Change			
21 22 23	Page Line Change Reason for change:			
21 22	Page Line Change Reason for change:			

11 (Pages 156 - 158)

[**& - 99**]

	I	T	
&	151 120:7	29 120:11	5
& 121:8	16 136:15	147:24	5 120:6 151:10
0	139:14	2:00 127:15	5-7 136:15
	18 135:8	146:1	50/50 143:1,4
05231 119:5	142:24	2nd 122:6	5897010 157:1
123:1	1:20 119:5,9,14	3	5:09 122:7
05232 119:9	123:1,2,3	3 120:4 128:10	5:10 119:19
123:2	2	128:16 132:2	5:49 152:9
05233 119:14	2 119:19	30 123:23	5:49-5:57
123:3	20 131:6	156:4 157:6	152:10
1	141:11,12,13	300 156:23	5:57 152:12,17
10 120:8	141:21 156:23	30009 121:14	6
133:12,13,19	200 121:13	30076 156:24	
135:18 153:5	2017 126:16	30303 121:5	6 123:23
10/29/2018	127:9 129:8,20	30309 121:9	625 147:25
120:8	131:13 132:3	3097 133:14	631 147:25
1000 119:21	144:12,18	3098 133:15	6:00 146:14,17
121:9	146:14 151:19	343-9696	152:18
10:00 127:14	2019 126:16	156:24	7
146:14,16	127:10 129:20	3765 128:18	7 157:6
11/14/2017	131:13 144:12	3774 128:19	770 156:24
120:4	144:18 146:14	3:00 124:21	8
1105 119:20	151:20	4	8/15 120:6
121:8	2023 119:19	404.658.9070	8/16 120:6
124 120:16	122:7 155:15		8/17/2017
128 120:5	229 121:4	121:5 404.815.3500	120:6
12th 155:15	24 131:17	121:10	9
133 120:9	24/7 130:10	4105 144:2	_
1401 119:25	132:11,21	4110 144:2	9 120:9
155:18	2500 121:4	4649 124:12	9-11-28 153:6
14080 155:18	2554 151:11	134:4	9-11-30 157:6
144 120:10	2555 151:11	470.386.6900	911 130:11,25
147 120:11	2710 121:13	121:14	145:3
15-14-37 153:7	28 120:10	121.14	99 131:24
153:20	144:1		

800.808.4958 770.343.9696

[a.g. - believe] Page 2

a	128:17 133:21	apologize	attorney
a.g. 119:3	134:9 136:2,18	124:20	153:19 155:8
121:11 122:5	144:20 148:19	appearances	156:16
122:13,20,25	afternoon	121:1	attorneys
a.m. 127:15	122:12	appears 132:3	153:24
146:1,14,17	age 136:8,15	applied 123:22	automatically
ability 155:4	142:24	123:23 153:20	153:20
able 130:9	agent 120:7	area 150:16	aware 132:10
139:7	151:12,13	arrangements	139:12 150:17
above 156:19	152:3	155:13	awareness
absolute	ages 143:8	article 153:5	148:22
155:13	agree 135:22	articles 120:11	b
access 151:16	136:3	ashar 119:18	b 119:6,10,15
154:1,2	agreeable	122:4,21 134:2	119:25 122:5
account 151:15	123:9	138:4 156:3	123:23 153:5,7
151:16,17,20	agreed 123:18	asked 130:2	153:20 155:18
151:10,17,20	agreement	asking 134:18	back 129:7
accurate 126:3	153:16,19	151:6,7	139:3 147:3
144:21 153:12	155:12	assigned	
act 123:16	ahead 150:4	153:11	148:12,14,16
act 123.10 action 119:4,8	alert 139:17	assignment	148:18,19 152:11 156:4
119:13 153:15	allowed 140:24	157:1	
155:9,12	alpharetta	assist 157:8	bad 150:20 based 126:13
actually 138:16	121:14	assume 137:8,9	
144:23,24	answer 125:11	147:20	155:12
additional	125:14,24	atl 157:1	basically
	138:13	atlanta 119:2	139:18 140:6
157:9 addressed	answers 153:22	119:23 121:5,9	basis 153:8
	155:5	attach 157:10	bates 128:18
133:25 138:1	anybody	attached 156:9	133:14 144:2
140:10	129:10 138:9	attaching 120:4	151:11
adult 143:15	138:20,20	120:9	behalf 121:2,6
adults 143:2,15	140:10,12	attachment	121:11 122:13
advised 134:2	150:22	135:13,25	122:25
affirmative		136:5	believe 129:20
125:5 126:20			144:3 151:14

[best - contacted] Page 3

			_
best 124:18	145:1,3,4,11,16	158:4,6,7,9,10	common
155:4	145:17 146:21	158:12,13,15	142:15 143:1
bills 149:14	calling 130:25	158:16,18	143:12,14
black 136:17	camera 130:10	changes 153:23	145:6
board 153:6	capacity	156:9 157:3,4	communicating
booth 121:12	126:10	157:6	137:19 152:2
122:19	caption 155:5	check 130:6	companies
bouchard	captured 125:7	137:11 145:5	129:17 132:11
120:16 121:3	card 140:12	150:23	132:16
122:12,13,24	cards 129:23	chief 120:4	company 128:7
123:12,21	130:15	128:19	129:5,5,11,15
124:3 127:23	care 133:2	child 143:14	130:4,19 131:2
142:19 143:7	cars 143:15	civil 119:4,8,13	132:6,9 151:4
143:22 145:12	case 121:6	123:15,16	compensation
147:19 152:7	122:25 123:2,3	157:6	153:15 155:12
152:13	133:5 140:22	clocking	complete 126:3
brandon	153:8,8,20	145:25	153:11,22
121:16 122:8	cases 121:11	close 133:1	completed
brantley	123:6	code 153:14	156:22
121:16 122:8	ccr 155:18	155:11	compliance
brochure 127:7	certainly	colloquies	153:4,14
brown 119:25	125:18	153:22 155:5	155:10
120:4 129:3,11	certificate	come 127:6	computer
155:18	155:1	129:14 130:7	148:15
business	certified 153:9	130:21 131:4	concern 142:16
129:23	153:23	134:15 137:24	142:22 143:24
c	certify 155:4,7	138:5,17	concluded
c 122:1 153:6	157:2	140:12 143:8	152:18
cabinet 148:14	chain 120:6	comfortable	concludes
149:24,24	151:12	130:25	152:14
call 128:16	chance 144:5	coming 129:22	confident 131:3
130:7,11	change 157:12	commission	considering
131:24 132:24	157:14,15,17	158:25	127:10 131:11
133:6 138:22	157:18,20,21	commitment	contacted
139:10 144:23	157:23 158:1,3	155:13	153:18
137.10 1-77.23			

Veritext Legal Solutions

800.808.4958 770.343.9696

[continued - dnr] Page 4

continued	couple 132:6	155:15 158:21	desire 157:7
119:18	135:8 137:24	days 131:9,10	desk 139:1
contract	course 133:9	156:4	148:15
153:15 155:11	court 119:1	decision 130:17	determined
contracts 153:8	122:10 123:21	defendant	153:15
conversation	125:3 153:6,9	119:6,11,15	different 128:6
125:4	153:23 155:14	121:6,11	direct 153:15
convey 133:2,4	156:20,23	defendants	155:11
copies 139:2	cover 128:3	123:5	direction 155:6
150:5 156:17	credibility	dekalb 130:7	directly 139:4
copy 140:22	130:20	131:23 132:19	disclosure
correct 126:19	crimes 150:16	133:3 140:19	153:6
127:19 134:10	cross 123:2,14	150:17	disclosures
135:14 136:6,9	123:18	denotes 120:12	153:1,3,4,17
137:10,17	cs 156:25	deponent 156:3	discount
144:19 145:22	cubby 149:18	156:8,10,12,20	153:21
146:10 147:21	customer 139:4	deponent's	discounts
150:2 153:22	customers	156:8 158:20	153:20
155:6	139:8	deposition	discuss 138:17
corrections	cv 119:5,9,14	119:18 122:4	139:24 150:6
156:9 157:9	123:1,2,3	122:24 123:1,7	150:18
correctly	d	123:12,13	disputing 135:6
130:24 132:1		124:8,16 126:3	137:1,3
139:9	d 119:6,10,15	128:11,14,15	disqualificati
counsel 121:1	122:1,5	133:12,13	153:6
122:9 123:5	daily 149:15,15	152:18 156:1,8	disqualify
153:2	damage 140:23 dana 121:7	157:7	153:13 155:10
counter 138:19		depositions	distributed
counties 140:19	122:15 156:2	125:3	150:1
county 130:7	date 122:6 156:4	describe 140:4	distributing
131:23 132:20	david 119:25	148:13 149:1	150:5
133:3,22	121:3 122:12	describing	district 119:1,1
139:13 140:19	155:18	147:11	division 119:2
150:17 155:2		description	dnr 140:25
	day 128:4	120:3	
	131:7,17		

800.808.4958 770.343.9696

[document - front]

	• • • • • • • • • • • • • • • • • • • •		007 4 10 0 1
document	emailed 129:8	examination	file 149:24
144:16 148:1	emails 135:9	123:18 124:2	156:16
149:5 150:25	151:20,24	examinations	filed 156:19
documents	employee 155:8	120:14	filing 148:14
149:12	employees	examined	fill 156:10,10
doing 130:8	140:21	122:22	financial 153:7
150:20	entered 157:7	example	financially
drichens 156:2	entire 128:4	143:13	155:8
drive 124:12	eric 121:12	except 153:8	finch 121:3
134:4	122:18	exhibit 120:3,4	finish 138:24
driving 141:8,9	errata 156:1,4	120:6,8,10,11	firing 127:1
141:15	156:9,10,12,15	128:10,11,15	firm 153:1,17
dropping	156:17,19,22	128:16 132:2	first 122:22
129:23 130:14	157:1	133:12,13,19	128:11
due 156:4	esq 121:3,7,12	135:18 144:1	five 144:17
duly 122:22	156:2	147:24 151:10	flyer 139:22
e	estimates	exhibits 120:1	following 153:1
	124:23	128:14 153:23	153:4 157:4
e 122:1,1 157:6	ethics 153:14	153:24 154:1	follows 122:23
ears 132:21	155:11	experience	foregoing
	everybody	130:18 142:15	155:4
efficiency 128:12	139:11,11,15	experiences	form 123:8
efficient 124:18	139:23 140:2	126:14	127:21 139:20
elderly 143:5	140:11	expires 158:25	142:17 143:3
•	evidence 155:6	eye 150:8,21	143:19 145:8
electronically	ex 120:9	eyes 132:21	147:17 157:7,9
156:10	exact 132:6	f	forms 153:6
email 120:4,6,8	142:18	_	forth 136:17
128:19,22	exactly 129:4	facility 156:23	forward 130:13
132:7 133:20	129:13 134:19	familiar 132:8	156:16
134:22 135:1	136:21 137:23	fbi 151:12	four 141:6
135:11,13,20	138:1,16 142:6	152:3	144:17 145:21
136:21 139:12	143:4 144:14	february 146:9	front 139:1
147:14,20	145:14 148:3	federal 123:15	144:16
151:11 156:13	151:9	157:6	

[fulton - islam] Page 6

	I		
fulton 155:2	gotten 142:12	hotel 124:7	industries
furnish 157:9	greetings 156:6	126:14,17,23	119:5,10,14
further 155:7	ground 125:2	127:1,5,14	122:5,17,19
g	group 150:19	128:7 129:8	information
g 122:1	guardian 134:3	131:6,15,21	138:23 149:11
g.w. 119:7	guests 133:7	133:8 137:22	initials 124:1
121:11 122:13	guide 145:2	138:10 139:14	inn 119:6,10,15
122:20	h	hour 145:21	122:6 123:24
g.w.'s 123:3	h 121:3	hours 131:7,17	124:6,7,11
ga 156:24	hall 121:12	housekeepers	134:3 142:21
gambrell 121:8	122:19	132:22 139:6	151:14,17
122:16	handing 133:11	huh 125:5	interest 153:7
gender 136:8	handout 132:7	126:20 128:17	153:12 155:9
generally	hanging 140:4	133:21 134:9	interested
143:24 145:16	140:15	136:2,18	155:8
georgia 119:1	happen 125:18	144:20 148:19	interview
119:23 121:5,9	139:19	human 120:11	129:25
121:14 123:16	happened	148:5 149:6	introduce
153:4,10 155:2	129:19 145:4	i	122:9 129:14
getting 143:16	145:21 147:5	ids 140:22	inv 120:8
girl 139:14,16	hard 139:2	150:22	investigator
give 127:6	150:5	ii 119:6	133:20 135:22
given 155:6	hearing 142:11	immediately	137:20,24
157:8	height 136:9	139:16	138:11 139:13
giving 125:11	help 133:8	impacts 155:13	147:15
gmail 128:20	134:4	impacts 133.13	islam 119:18
151:15,17	hire 128:6	155:14	120:10 122:4
go 130:10	131:6	impartiality	122:21 124:4
147:3 150:4	hiring 126:22	153:14 155:10	124:17 126:9
152:7	hold 138:14	including	126:22 128:12
going 124:17	146:6	123:17	128:23 129:17
125:24 128:16	holding 135:16	index 120:1,14	133:14,15
144:7 150:7,16	homeless	indicates 136:8	135:2 138:13
good 122:12	131:10	individual	144:2 147:9
126:3,5	131.10	126:10	148:1 149:2
120.5,5		120.10	

[islam - modified] Page 7

	1		
150:25 152:13	148:21 150:12	lot 124:24	145:13
156:3	151:2,7,7	m	mccranie 121:3
issue 123:8	knowledge	made 153:4,23	mean 125:25
130:22 131:1,4	126:13 127:12	155:13	means 139:23
131:25 133:5	knows 138:3	mail 149:15,15	143:15
issues 132:25	140:2	149:15	meant 147:7
items 140:15	1	mails 149:9,13	meeting 138:14
j	law 153:4	149:15	138:16 139:10
j 119:25 155:18	lawsuit 123:3,4	maintaining	139:19,21,21
j.g. 119:12	lawyers 125:7	153:14 155:10	152:3
121:6 122:14	leave 144:24	maintenance	memorial
122:17 136:15	left 138:19	132:22 139:6	124:12 134:4
138:11 147:8	legal 153:10,18	make 124:14	memory 142:4
147:10	license 141:9	125:17 130:17	142:9
j.g.'s 123:4	141:15	140:21 153:11	mention 133:9
job 144:25	licenses 141:9	157:7	133:10
jpb 119:5,9	likely 125:18	making 153:13	message 144:6
	limited 123:17	157:8,8	144:24 145:1
k		·	messages
		F11·3F1·3414AF	
k.j. 151:12	line 134:7,11	manager	120:10 136:21
keep 150:7,21	134:12,20	126:17	
keep 150:7,21 keeping 124:20	134:12,20 157:12,15,18	126:17 mansell 156:23	120:10 136:21
keep 150:7,21 keeping 124:20 128:13	134:12,20 157:12,15,18 157:21 158:1,4	126:17 mansell 156:23 manually	120:10 136:21 144:3,10,11,17
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16	126:17 mansell 156:23 manually 156:10	120:10 136:21 144:3,10,11,17 145:7,10
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12	126:17 mansell 156:23 manually 156:10 marked 120:12	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25	126:17 mansell 156:23 manually 156:10 marked 120:12 material	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7 150:15	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21 located 134:3	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10 materials 151:2	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7 134:12,24,25
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7 150:15 know 125:19	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21 located 134:3 long 124:17	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10 materials 151:2 matter 122:4	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7 134:12,24,25 135:25 136:9
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7 150:15 know 125:19 125:22 130:20	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21 located 134:3 long 124:17 look 144:16	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10 materials 151:2 matter 122:4 122:17 153:12	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7 134:12,24,25 135:25 136:9 136:13 139:13
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7 150:15 know 125:19 125:22 130:20 132:24 134:17	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21 located 134:3 long 124:17 look 144:16 147:24	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10 materials 151:2 matter 122:4 122:17 153:12 153:19 155:10	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7 134:12,24,25 135:25 136:9 136:13 139:13 140:17 142:12
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7 150:15 know 125:19 125:22 130:20 132:24 134:17 138:22 139:6	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21 located 134:3 long 124:17 look 144:16 147:24 looking 139:15	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10 materials 151:2 matter 122:4 122:17 153:12 153:19 155:10 matters 122:20	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7 134:12,24,25 135:25 136:9 136:13 139:13 140:17 142:12 142:20 143:11
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7 150:15 know 125:19 125:22 130:20 132:24 134:17	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21 located 134:3 long 124:17 look 144:16 147:24 looking 139:15 looks 144:15	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10 materials 151:2 matter 122:4 122:17 153:12 153:19 155:10 matters 122:20 mcclelland	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7 134:12,24,25 135:25 136:9 136:13 139:13 140:17 142:12 142:20 143:11 143:11,14,15
keep 150:7,21 keeping 124:20 128:13 kids 143:5,16 kind 127:7 130:5 138:23 140:1,9 148:4 149:11 150:7 150:15 know 125:19 125:22 130:20 132:24 134:17 138:22 139:6	134:12,20 157:12,15,18 157:21 158:1,4 158:7,10,13,16 list 137:12 140:25 llp 121:3,8 local 130:21 located 134:3 long 124:17 look 144:16 147:24 looking 139:15	126:17 mansell 156:23 manually 156:10 marked 120:12 material 148:24 149:25 150:10,10 materials 151:2 matter 122:4 122:17 153:12 153:19 155:10 matters 122:20	120:10 136:21 144:3,10,11,17 145:7,10 milton 121:13 minors 142:16 142:22,23 missing 134:7 134:12,24,25 135:25 136:9 136:13 139:13 140:17 142:12 142:20 143:11 143:11,14,15 143:23 147:8

Veritext Legal Solutions

800.808.4958 770.343.9696

[morning - people]

	T		
morning	122:5,16,19	147:4 148:8,10	146:14,16
146:15,18,18	northern 119:1	148:11,12,14	152:9,10,12,17
motels 150:18	notarized	148:16,18,19	152:18
move 130:13	156:13	officer 130:17	page 120:3,15
n	notary 158:24	145:13 155:14	157:12,15,18
n 122:1	noted 157:3,4	officers 130:17	157:21 158:1,4
name 122:7	notice 123:7	130:21 133:10	158:7,10,13,16
123:25 132:9	135:25 136:19	137:24	pages 157:9
134:17 136:11	136:24 137:17	offices 156:4,13	paper 149:2
138:21	138:15,25	okay 124:9,13	paperwork
names 129:16	140:1 141:24	124:19,22	140:17 148:4
134:16	147:12	125:1,12,15,16	parents 134:14
nbi 128:18,19	noticed 123:2	125:20,23	parkway
133:14 144:2	notices 123:14	126:1 130:4,8	121:13
147:25 151:11	123:14 140:9	138:18 139:11	part 135:18
ne 119:20	140:13	old 121:13	parties 153:20
121:4,8	noticing 153:18	139:14	154:2 155:14
	noting 156:9	once 156:12	156:17
necessary 157:9	number 138:21	open 132:21	party 153:15
need 137:25	numbers	operate 148:23	153:21 155:8
140:10	128:13	opinion 131:19	155:11
never 133:1	0	opposed 131:1	pass 127:8
new 125:14	o 122:1	ordering 154:2	password
132:3 148:24	object 127:21	156:17	154:1,2
150:15	139:20 142:17	original 156:16	patrol 130:6
news 150:14	143:3,19 145:8	156:19	pdf 156:9
newsletter	147:17	outcome 155:8	peachtree
150:11,13,14	objections	outside 130:10	119:20 121:4,8
nice 124:4	123:7	overnight	pending 143:20
night 146:5,12	obligation	146:2,9	people 129:14
146:20 147:6	153:14 155:10	p	129:22 130:1
nighttime	ocga 153:6,7,20	p 122:1	131:10,12
146:11 147:4	157:6	p.c. 121:12	132:23 139:7
northbrook		p.m. 119:19	142:24 143:24
	office 133:1,23	p.m. 119:19 122:7 127:14	143:25 150:19
119:5,10,14	139:3,4 140:7	122./ 12/:14	

[percent - questioning]

percent 131:24	plaintiff's	primarily	proposals
period 126:22	128:10,16	151:13	127:4 129:6
127:9,13	132:1 133:11	print 156:10	132:6,15
131:13,20	133:13,19	private 130:3	protected
permitted	135:18 144:1	131:1,14	154:1,2
123:15	147:24 151:10	privilege 123:9	protective
person 130:12	plaintiffs 121:2	problem 130:8	120:5
134:7,12,24,25	123:25	131:23 145:2	provide 126:3,6
136:1,9,13	play 150:4,24	problems	127:5 138:25
138:23 139:25	please 122:9	130:23 132:25	153:18
140:12,23,23	124:10 125:10	procedure	provided
140:24 143:5	125:19 127:22	123:16 157:6	132:11
143:11 147:8	139:16 156:13	proceeding	providers
personal	156:22 157:9,9	153:1,21 154:1	127:5,11
126:13	point 131:5	155:7,13	public 158:24
personally	132:24	proceedings	punch 140:7,12
138:4 150:1	points 124:7	153:12	purpose 148:20
persons 139:5	police 130:21	produced	purposes
140:17 142:12	possible 124:18	147:21 153:22	123:15
142:20 143:23	posted 147:9	production	pursuant
photo 136:5	practice 123:16	156:23	123:13 157:6
139:15 141:19	151:19,24	professional	put 139:3,22,22
141:20 147:10	prepared 126:6	153:14 155:11	140:1,9,11,22
photos 141:13	preparing	prohibited	141:19,24
141:22	150:24	153:19	142:6 149:9,24
physical 145:23	present 121:15	prohibitions	putting 142:5,9
picture 134:15	123:6	153:8	q
139:8	presented	promise 125:13	
pictures 140:18	153:1	properly	question 123:8 125:11,14,17
141:1,4,6	preservation	123:13	' '
place 153:19	123:17	property	125:21,24 127:22 140:13
plaintiff 119:3	preserved	140:25 147:2	142:18 143:20
119:8,12	123:9	proposal 120:5	144:10
122:13,25	previously	129:2,7 132:2	
	120:12		questioning 152:14
			132.14

[questions - rules]

			1
questions 147:8	137:10 147:12	129:16 132:2,5	responding
153:22 155:5	recess 152:10	132:8 135:5,8	147:16,22
r	recommend	135:10,12	response
r 122:1	131:5,8,14	136:19,22,23	137:15 147:12
race 136:8	record 122:7	136:25 137:6,7	responsibilities
rarely 145:10	122:10 125:8	137:9,13,14,19	126:21,25
read 148:2	152:7,8,11,16	137:21,22	127:3
149:10 150:9	153:12,13,22	138:2,9 152:4	responsibility
156:8 157:2	155:6	152:5,6	156:9
reads 134:24	recording	rephrase	returned
realize 135:4	125:4	125:19	156:15,19
really 131:11	reduced 155:5	report 145:24	review 144:5
144:7,11	refer 124:6	146:24,25	151:15,20,24
reason 125:22	reference 124:1	147:1,8 153:13	153:1 156:9
126:2 157:14	references	reporter	reviewing
157:17,20,23	123:24	122:10 123:21	132:3
158:3,6,9,12,15	referring	125:3 153:1,3	richens 121:7
158:18	124:11	153:7,9,23,24	122:15,15
reasonable	refers 138:4	reporting	123:10,19
123:6	regarding	153:6,18	127:21 156:2
reasons 157:8	138:23	reports 142:12	right 126:11
recall 127:10	registered	142:16,20	130:17,22
129:9,10	134:17	143:23 145:20	133:6 134:8,18
136:20 138:7,8	regular 149:8	repository	135:1,20 144:6
147:11,13,16	regulations	154:2	robbing 150:19
152:2	153:5	representations	rockdale
receive 135:8	related 130:12	153:4	133:22 139:13
137:2	relating 154:1	representing	role 150:24
received 135:1	relationship	122:16,19	rooms 132:25
135:6,7 137:11	153:12 155:9	requested	roswell 156:24
138:15 139:12	relative 155:7	156:8	routine 151:19
receives 153:21	rely 130:20	reserved	rule 123:22
receiving 123:6	remember	152:19	157:6
135:5,11	125:2 128:24	respond 137:13	rules 123:15
136:23 137:6	128:25 129:2	147:15	125:2 153:5

[rules - specific]

	100 00 00		12122
157:6	138:20,20,22	sgrlaw.com	134:5,25
russell 121:8	139:4,5,7,16	156:2	135:15,24
122:16	140:12,23	shareef 120:7	136:4 138:8
S	149:10 150:8	124:24 138:10	141:14,14
s 122:1	seeing 129:2	143:13 151:5	142:14 144:5
sake 128:12	136:19	151:13,16	148:13 150:4
saw 131:1	seeking 127:4	shareef's	152:15
132:5,6,15	seem 144:21	123:23 128:14	sit 135:4,10
148:4,7	seems 135:4	128:15 133:12	situation 145:5
saying 130:25	138:3	sheet 156:1	sleeping 144:25
133:7,8 137:4	seen 128:22	shelf 149:16,16	smith 121:8,12
141:17,25	129:7 142:21	149:19,23	122:15,19
149:22	143:24 147:1	shelves 149:21	solely 153:15
says 134:2,12	147:14,25	sheriff's 133:23	155:12
136:15 138:4	seg 119:14	shift 138:17,24	solutions
149:6	select 132:18	140:14 146:2	153:11,18
seal 156:16	send 145:6,10	146:10,14,22	solve 130:7,22
section 153:6	156:16,22	146:22	131:4,22,25
sections 153:7	sense 124:14	shifts 145:22	somebody
	125:18	show 134:15,16	127:6 133:1
security 120:5	sergeant	showed 131:24	134:16 138:10
126:22 127:1,4 127:10,14	120:10 127:15	146:19	138:17,19
128:7 129:3,4	127:24 128:8	showing 128:10	140:23 146:19
1	144:4,12,18	144:1 151:10	150:8
129:5,11,11,14	145:7	sign 156:8	sorry 146:6,7
130:3,14,19 131:2,6,12,14	serve 155:13	signature	sort 149:18
131:20 132:8	served 123:13	152:19 155:18	sounds 142:11
	service 130:4	156:3,20	southeast
132:11,13 see 124:4	services 120:5	158:20	156:25
	120:5 127:4,5	signed 156:12	speak 145:25
128:20 129:5	127:11 128:7	156:15,19	speaking
130:11 133:15	129:3,11,12	simplicity	145:16
133:16,17,22	130:3,5 153:18	128:13	specific 136:22
133:24 134:5,6	seven 128:4	sir 124:4,5,6,10	138:2 142:4,9
134:13,18		125:9 126:12	147:13 153:20
136:1,15,20			

[specifically - times]

specifically	subscribed	149:19	142:11 146:8
139:25 153:5	158:21		157:2,7
speculate 151:6	substance	t	text 120:10
stack 149:2	144:8 157:7	table 148:16,17	144:3,17 145:7
staff 138:14,16	suite 119:21	148:18,20,21	145:10,10,13
139:5,10 150:2	121:4,9,13	149:1,2,5,7,8	145:18
150:3,3	156:23	149:12,16	thank 134:4
stamped	suites 119:6,10	take 124:16	152:13,15
128:18 133:14	119:15 122:6	125:25 133:2	thing 130:9,16
144:2 151:11	124:7,12	138:13 147:24	140:25 148:3
state 153:9	142:22	taken 122:4,25	150:11,13
155:2	sumlin 120:4	123:13,14	things 131:12
stated 155:4	128:19	155:4	138:18 143:16
statement	suppose 142:25	talk 137:24	150:7,9
157:8	sure 125:2	138:5,14	think 124:16
states 119:1	129:4,13,21	140:14 145:3	131:23 142:1
staying 134:3	130:16 134:19	talking 129:10	143:13 144:24
steps 147:11	138:12 141:24	138:11 141:8	148:2
street 119:20	142:2,3 143:4	141:14,16	third 128:15
121:4,8	144:13,14	150:12 152:2	three 123:5
strickland	145:15 147:9	tell 124:10 133:10 137:8	141:1,5 144:16
151:12,14	147:18,22	137:25 140:20	tim 133:20
152:3	148:3 151:15	145:1 147:5,5	time 122:7
strickler 120:7	surprise 144:22	150:20	126:16,22
strictly 130:19	surprised	ten 141:7,9	127:9,13 128:2
stuff 149:9	142:8	tenant 137:12	128:3 131:6,9
subcontractor	suspected	tenants 132:23	131:13,19,22
153:10,16	139:14	133:7	137:13 140:12
155:12	suspicious	terms 153:16	145:9,19
subject 134:7	130:6	155:12	146:18 153:21
134:11,12,20	swear 122:11	testified 122:23	156:19
submit 145:20	sworn 122:22	testifying	timecards
145:23	158:21	126:10	140:8
submitted	system 148:23	testimony	times 145:14
153:23,24	148:23 149:18	123:18 126:4,8	

[title - worker] Page 13

title 126:17 today 124:8,17 126:4 135:4,10 today's 122:6 together 127:25 top 149:16 trafficking 120:11 148:5 149:6 training 148:24 149:25 150:9 150:10 151:4 transcript 123:22 124:1 153:21 155:4,6 155:5 159:0 157:2 transcripts 153:21 154:1 true 153:22 155:6 try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 136:24 139:9 142:25 146:1,9 148:5 typical 146:13 146:16 151:23 typically 142:22 146:1,9 124:10 125:5 138:21 122:18 123:11 125:25 146:4,8 151:23 typically 126:20 128:17 133:21 134:9 126:20 128:17 133:21 134:9 120:4,9 128:20 uploaded 154:2 underinaded 154:2 use 157:9 usually 139:3 144:23 145:9 144:23 145:9 144:23 145:9 140:20 vante 128:6 141:12,3,5,13 141:16,22,25 142:5,9 147:10 validinade49 120:4,9 128:20 uploaded 154:2 use 157:9 usually 139:3 144:23 145:9 144:23 145:9 140:20 vanted 140:18 various 124:7 vendors 130:14 veritext 153:10 153:13 156:23 veritext.com 156:25 versus 122:5 video 122:3 videographer 121:16 122:3,8 125:1 126:9 132:1 understand 125:19 140:20 validinade49 120:4,9 128:20 uploaded 154:2 use 157:9 usually 139:3 141:16,22,25 142:5,9 147:10 vantelionade49 120:4,9 128:20 valid 139:23 140:2,4,5,8,16 141:2,2,3,5,13 141:16,22,25 142:5,9 147:10 vantelionade49 120:4,9 128:20 valid 139:3 140:20 vanted 140:18 veritext.com 153:13 156:23 veritext.com 156:25 versus 122:5 video 122:3 videographer 121:16 122:3,8 125:4 152:8,11 152:15 videographer 121:16 122:3,8 125:4 152:8,11 152:15 videographer 121:16 122:3,8 125:1 152:16 138:21 140:20 valid 125:0,13 veritext 153:10 127:11,15,16 127:24 128:8 144:2,18 140:20 141:2,2,5,5,13 140:20 vanted 140:18 various 124:7 vendors 130:14 veritext.com 153:18 156:23 veritext.com 156:25 video 122:3 videographer 121:16 122:3,8 125:16 122:16 videographer 121:16 122:3,8 125:15 152:16 videographer 121:18 123:11 152:15 videographer 121:18 123:11 152:15 videographer 121:18 123:11 156:23 veritext 153:10 127:24 128:8 144:4:1,2,18 146:23 140:20 vanted 140:18 various 124:7 veritext.com 156:23 videographer 121:16 122:3,8 125:16 122:18 123:11 152:15 videographer 123:15				
126:4 135:4,10 today's 122:6 together 127:25 top 149:16 trafficking 120:11 148:5 149:25 150:9 150:10 151:4 transcript 123:22 124:1 153:21 155:4,6 156:9;16,19 157:2 true 153:22 155:6 true 153:2 true 15	title 126:17	u	124:6,7,11	147:15
126:4 135:4,10	today 124:8,17	uh 125·5	134:3 142:21	wait 125:10,13
today's 122:6 together 133:21 134:9 unitedinn4649 wall 139:23 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 141:2,2,3,5,13 141:16,22,25 141:16,22,25 141:16,22,25 142:5,9 147:10 want 128:6 142:5,9 147:10 want 128:6 139:11,15 142:5,9 147:10 want 128:6 139:11,15 141:16,22,25 142:5,9 147:10 want 128:6 139:11,15 142:16 122:17 124:7 veritext 153:13 veritext 153:13 veritext.com <	126:4 135:4,10		151:14,17	waiting 124:20
together 127:25 136:2,18 120:4,9 128:20 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 140:2,4,5,8,16 141:2,2,3,5,13 141:1,2,2,3,5,13 141:1,2,2,3,5,13 141:1,2,2,3,5,13 141:1,6,22,25 142:5,9 147:10 want 128:6 139:11,15 140:20 watch 130:10 weritext 153:10 127:11,15,16 127:24 128:8 144:41,13 144:11,15,16 127:24 128:8 144:41,11,15,16 127:24 128:8 144:41,12,18 144:41,12,18 145:3,10 week 128:4 144:41,12,18 145:3,10 week 128:4 144:41,12,18 145:3,10 <td>today's 122:6</td> <td></td> <td>unitedinn4649</td> <td>wall 139:23</td>	today's 122:6		unitedinn4649	wall 139:23
127:25 top 149:16 trafficking 120:11 148:5 149:6 training 148:24 149:25 150:9 150:10 151:4 transcript 123:22 124:1 153:21 155:4,6 156:9,16,19 157:2 transcripts 153:21 153:21 153:21 153:21 155:6 true 153:22 155:6 try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 155:5 typical 146:16 151:23 typically 142:22 146:1,9 142:22 146:1,9 142:22 146:1,9 142:22 146:1,9 142:21 total 140:16 trafficking 142:16 transcript transcript 123:12 transcript 123:20 139:20 142:5,9 147:10 want 128:6 139:11,15 140:20 wanted 140:18 watch 130:10 weber 120:10 127:11,15,16 127:24 128:8 144:4,12,18 156:23 veritext.com 156:23 veritext.com 156:25 video 122:3 videographer 121:16 122:3,8 125:21 126:9 132:1 type 148:22 typewriting 155:5 typical 146:13 146:16 151:23 typically 142:22 146:1,9 142:22 146:1,9 142:22 146:1,9 142:22 146:1,9 142:20 133:20 135:22 137:20 138:11 type 148:24 typically 142:22 146:1,9 typically 142:22 146:1,9 typically 142:20 133:20 135:22 typically 142:20 133:20 135:22 typically 142:20 typically typi	together		120:4,9 128:20	140:2,4,5,8,16
top 149:16 uncommon use 157:9 usually 139:3 142:5,9 147:10 training 148:24 under 123:15 various 124:7 vanted 140:20 training 148:24 underneath 138:21 verious 124:7 vendors 130:14 veritext 153:13 veritext 153:13 veritext 153:13 veritext 153:10 127:12,15,16 127:12,15,16 127:12,15,16 127:11,15,16 127:12,15,16 127:12,15,16 127:11,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,11,15,16 127:12,12,12 128:13 128:13 </td <td>127:25</td> <td>·</td> <td>uploaded 154:2</td> <td>141:2,2,3,5,13</td>	127:25	·	uploaded 154:2	141:2,2,3,5,13
trafficking 120:11 148:5 149:6 under 123:15 usually 139:3 142:5,9 147:10 want 128:6 training 148:24 149:25 150:9 150:10 151:4 various 124:7 vendors 130:14 verbatim verbet im 153:13 verbet im verbet im 127:11,15,16 127:11,15,16 127:24 128:8 144:4,12,18 127:11,15,16 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 145:3,10 week 128:4 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 week 128:4 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 week 119:20 121:8 121:16 122:3,8 125:16 122:3,8 125:16 123:4 125:15 152:15 witnesses 153:24 witnesses 153:24 work 127:25 130:18 146:1,9 work 127:25 130:18 146:1,9 146:11,3,16 146:11,3,16 <td>top 149:16</td> <td></td> <td>use 157:9</td> <td>141:16,22,25</td>	top 149:16		use 157:9	141:16,22,25
120:11 148:5 149:6 training 148:24 155:5 underneath 138:21 142:24 155:5 underneath 138:21 underriner 123:22 124:1 153:21 155:4,6 156:9,16,19 157:2 transcripts 153:21 154:1 true 153:22 155:6 try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 155:5 typical 1 46:13 146:16 151:23 typically 142:22 146:1,9 142:22 146:1,9 142:22 146:1,9 142:22 146:1,9 142:21 under 123:15 various 124:7 vandors 130:14 verbatim 153:13 veritext 153:10 127:11,15,16 127:24 128:8 144:4,12,18 156:23 veritext.com 156:25 versus 122:5 video 122:3 videographer 121:16 122:3,8 125:4 152:8,11 152:15 videotaped 119:18 visiting 137:22 volume 119:6 vs 119:4,9,13 146:11,13,16 146:18 vorked 140:18 vatch 130:10 veber 120:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 veritext.com 156:25 video 122:3 videographer 121:16 122:3,8 125:4 152:8,11 152:15 videotaped 119:18 visiting 137:22 volume 119:6 visiting 137:22 volume 12:8 visiting 137:22 volume 13:6 visiting 13:20 v	trafficking		usually 139:3	142:5,9 147:10
149:6 training 148:24 149:25 150:9 150:10 151:4 transcript 123:22 124:1 138:21 verbatim watch 130:10 155:9 underneath 153:13 veritext 153:10 156:9,16,19 157:2 122:18 123:11 123:20 139:20 153:18 156:13 127:24 128:8 153:21 154:1 123:20 139:20 156:23 veritext.com 156:23 153:21 154:1 147:17 versus 122:5 week 128:4 145:3,10 veritext.com 136:17 155:6 157:2 video 122:3 155:19 understand 125:16 122:3,8 141:1,5 145:14 125:21 126:9 132:1 155:5 132:1 videotaped 155:5 understanding 130:24 139:9 155:5 understanding 130:24 139:9 155:5 understood 146:16 151:23 typical 146:13 125:25 146:4,8 151:23 videotaped 119:10,15 videotaped 119:10,15 videotaped 119:4,9,13	120:11 148:5		144:23 145:9	want 128:6
training 148:24 155:5 underneath 155:5 underneath 138:21 verbatim watch 130:10 watch 130:10 transcript 123:22 124:1 153:21 155:4,6 156:9,16,19 157:2 121:12 122:18 veritext 153:13 veritext 153:10 127:11,15,16 156:9,16,19 157:2 142:17 143:3 156:23 142:17 143:3 156:23 144:4,12,18 153:21 154:1 143:19 145:8 147:17 veritext.com 156:25 week 128:4 155:6 157:2 undersigned 157:2 video 122:3 weight 136:17 true 153:21 veritext.com 128:4 veritext.com 128:4 141:1,5 145:14 125:19 124:10 125:8 125:4 152:8,11 152:16 veritext.com 121:8 155:5 125:19 124:10 125:8 125:4 152:8,11 152:16 videorapher 121:8 videotaped 119:18 155:5 146:13 146:13 146:14,3 videotaped 119:18 vorket 127:13 vorket 121:8 155:5 146:16 151:23 146:16 151:23 videotaped 130:18 146:19 vorket 121:8 155:25 146:11,3 vide	149:6		V	139:11,15
149:25 150:9 150:10 151:4 transcript 123:22 124:1 153:21 155:4,6 156:9,16,19 157:2 transcripts 153:21 154:1 true 153:22 155:6 try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 155:5 typical 146:16 151:23 typically 142:22 146:1,9 142:22 146:1,9 150:10 138:21 underviner 153:23 united 119:1,6 119:10,15 undersioned 130:14 verbatim 153:13 veritext 153:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 weber 120:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 west 119:20 121:8 witness 122:11 152:15 witnesses 153:24 words 127:13 work 127:25 130:18 146:1,9 146:11,13,16 146:18 watch 130:10 weber 120:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 west 119:20 121:8 witnesses 122:11 152:15 witnesses 153:24 words 127:13 work 127:25 130:18 146:1,9 146:11,13,16 146:18 watch 130:10 weber 120:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 west 119:20 121:8 witnesses 153:24 words 127:13 work 127:25 130:18 146:1,9 146:11,13,16 146:18 watch 130:10 weber 120:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 west 119:20 121:8 witnesses 153:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 west 119:20 121:8 witnesses 153:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 west 119:20 121:8 witnesses 153:10 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 121:16 122:3,8 125:4	training 148:24			140:20
130:10 151:4 transcript 123:22 124:1 153:21 155:4,6 156:9,16,19 157:2 transcripts 153:21 154:1 true 153:22 155:6 try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 155:5 typical 146:16 151:23 typically 142:22 146:1,9 142:22 146:1,9 151:23 united 119:1,6 119:10,15 138:21 verbatim	149:25 150:9			wanted 140:18
transcript underriner 153:13 weber 120:10 123:22 124:1 153:21 155:4,6 156:9,16,19 157:2 153:18 156:13 127:11,15,16 127:24 128:8 127:24 128:8 144:4,12,18 127:24 128:8 144:4,12,18 145:3,10 week 128:4 144:4,12,18 145:3,10 week 128:4 week 128:4 weight 136:9 136:17 west 119:20 121:8 wideographer 121:16 122:3,8 witness 122:11 152:15 west 119:20 121:8 witness 122:11 152:15 witness 122:11 152:15 witnesses 153:24 witnesses 156:25 witnesses 121:16 122:3,8 witnesses 121:18 121:18 125:21 125:22 125:22 125:25 125:25 125:25 125:25 125:25 125:25	150:10 151:4			watch 130:10
123:22 124:1 153:21 155:4,6 156:9,16,19 157:2 123:20 139:20 142:17 143:3 156:23 143:19 145:8 153:21 155:6 157:2 155:6 157:2 155:6 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 156:25 147:17 156:25 147:17 156:25 157:2 155:6 157:2 124:10 125:8 125:21 126:9 132:1 152:16 127:11,15,16 127:24 128:8 144:4,12,18 145:3,10 146:15 123 156:25 146:4,8 125:21 126:9 136:17 121:16 122:3,8 125:21 126:9 132:1 152:16 127:24 128:8 144:4,12,18 145:3,10 146:16 127:24 128:8 144:4,12,18 145:3,10 146:16 123:1 156:25 146:0 122:3 126:0 121:16 122:3,8 125:4 152:8,11 152:15 152:16 127:24 128:8 144:4,12,18 145:3,10 146:16 123:4 121:16 122:3,8 125:24 125:4 152:8,11 152:16 127:24 128:8 144:4,12,18 145:3,10 146:13 127:12,18 145:3,10 146:13 121:16 122:3,8 125:24 125:4 152:8,11 152:16 127:24 128:8 144:4,12,18 145:3,10 146:17 136:9 136:17 121:16 122:3,8 125:4 152:8,11 152:16 127:24 128:8 144:4,12,18 145:3,10 146:13 145:3,10 121:16 122:3,8 125:4 152:3,8 125:4 152:3,8 125:4 152:8,11 152:16 127:24 128:8 144:4,12,18 145:3,10 146:17 136:9 136:17 121:16 122:3,8 125:4 152:8,11 152:16 121:16 122:3,8 125:14 152:15 125:15 125:16 127:24 128:8 144:4,12,18 145:3,10 146:13 145:3,10 121:16 122:3,8 125:14 156:25 125:4 152:8,11 152:16 127:24 128:8 144:4,12,18 145:3,10 146:13 145:3,10 121:16 122:3,8 125:14 121:16 122:3,8 125:4 152:8,11 152:16 121:16 122:3,8 125:14 152:15 125:15 125:15 125:16 127:24 128:8 144:4,12,18 145:3,10 145:3,10 145:3,10 125:24 125:3 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 125:14 121:16 122:3,8 1	transcript			weber 120:10
153:21 155:4,6 156:9,16,19 157:2 transcripts 153:21 154:1 true 153:22 155:6 try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 155:5 typical 146:13 146:16 151:23 typically 142:22 146:1,9 122:18 123:11 123:20 139:20 156:23 veritext.com 156:25 versus 122:5 video 122:3 videographer 121:16 122:3,8 125:21 126:9 132:1 videotaped 119:18 videotaped 119:18 visiting 137:22 volume 119:6 vs 119:4,9,13 146:11,13,16 146:18 vorked 142:21 vorker 149:10	123:22 124:1			127:11,15,16
156:9,16,19 157:2 transcripts 153:21 154:1 true 153:22 155:6 try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 155:5 typical 146:13 146:16 151:23 typically 142:22 146:1,9 123:20 139:20 156:23 veritext.com 156:25 versus 122:5 video 122:3 videographer 121:16 122:3,8 125:4 152:8,11 152:16 videotaped 119:18 visiting 137:22 volume 119:6 vs 119:4,9,13 144:4,12,18 145:3,10 week 128:4 weight 136:9 136:17 west 119:20 121:8 videotaped 119:18 videotaped 119:18 visiting 137:22 volume 119:6 vs 119:4,9,13 146:11,13,16 146:18 worked 142:21 vorker 149:10	153:21 155:4,6			127:24 128:8
157:2 142:17 143:3 veritext.com 145:3,10 153:21 154:1 143:19 145:8 156:25 true 153:22 versus 122:5 weight 136:9 155:6 video 122:3 videographer 125:19 124:10 125:8 125:4 152:8,11 140:17 17 videographer 121:16 122:3,8 125:19 124:10 125:8 125:4 152:8,11 125:21 126:9 132:1 videotaped 148:5 visiting 137:22 volume 119:6 vipical 146:13 visiting 137:22 volume 119:6 145:3,10 veek 128:4 weight 136:9 136:17 west 119:20 121:8 videotaped 19:18 visiting 137:22 volume 119:6 volume 119:6 visiting 137:22 volume 119:6 130:18 146:1,9 145:3,10 veritext.com 136:17 vest 119:20 121:8 vitnesses 153:24 vords 127:13 vork 127:25 130:18 146:1,9 145:3,10 veritext.com 155:25 136:17 videotaped 19:18 visiting 137:22 volume 119:6 visiting 137:22 130:18 146:1,9 146:18 146:18	156:9,16,19			144:4,12,18
transcripts 143:19 145:8 156:25 week 128:4 153:21 154:1 147:17 versus 122:5 weight 136:9 155:6 157:2 video 122:3 west 119:20 125:19 124:10 125:8 125:4 152:8,11 152:16 witness 122:11 150:21 157:2 videographer 121:16 122:3,8 witness 122:11 152:19 132:1 videotaped 152:15 witnesses 155:5 148:5 volume 119:6 vords 127:13 words 127:13 146:16 151:23 146:16 151:23 videotaped 130:18 146:1,9 146:11,13,16 142:22 146:1,9 143:19 145:8 videographer 121:16 122:3,8 vitnesses 152:15 152:15 videotaped 19:18 visiting 137:22 volume 119:6 vorks 127:13 146:16 151:23 videotaped 130:18 146:1,9 146:11,13,16 146:11,13,16 146:18 133:20 135:22 137:20 138:11 vorker 149:10	157:2			145:3,10
153:21 154:1 147:17 wersus 122:5 weight 136:9 155:6 157:2 video 122:3 west 119:20 125:19 124:10 125:8 125:4 152:8,11 152:16 witness 122:11 125:21 126:9 132:1 videotaped 153:24 141:1,5 145:14 125:21 126:9 132:1 videotaped 152:15 155:5 understanding 130:24 139:9 videotaped 153:24 155:5 understanding 130:24 139:9 videotaped 153:24 148:5 understood 125:25 146:4,8 visiting 137:22 works 127:25 130:18 146:1,9 146:11,13,16 146:18 147:17 understand 121:16 122:3,8 videotaped 19:18 visiting 137:22 volume 119:6 vorks 127:25 130:18 146:1,9 146:11,13,16 146:18 141:1,5 145:14 148:5 wade 120:8 153:24 worked 142:21 151:23 wade 120:8 133:20 135:22 worked 142:21 137:20 138:11	transcripts			week 128:4
true 153:22 undersigned video 122:3 west 119:20 try 125:10,13 125:19 two 128:4 124:10 125:8 125:21 126:9 125:4 152:8,11 152:16 witness 122:11 type 148:22 understanding videotaped 152:16 witnesses 125:15 witnesses typewriting 130:24 139:9 visiting 137:22 words 127:13 words 127:13 typical 146:16 151:23 understood 125:25 146:4,8 w 19:49,13 146:11,13,16 146:11,13,16 146:18 worked 142:21 worked 142:21 worker 149:10	153:21 154:1			weight 136:9
155:6 try 125:10,13 157:2 videographer 121:16 122:3,8 west 119:20 two 128:4 124:10 125:8 125:21 126:9 152:16 witness 122:11 type 148:22 type writing 130:24 139:9 videotaped witnesses typical 146:13 146:16 151:23 visiting 137:22 words 127:13 typically visiting 137:22 work 127:25 typically visiting 137:22 worked 146:11,3,16 typically visiting 137:22 visiting 137:22 visiting 137:22 visiting 137:22 volume 119:6 volume 119:6 visiting 137:22 volume 139:6 visiting 137:22 <	true 153:22			136:17
try 125:10,13 125:19 two 128:4 141:1,5 145:14 type 148:22 typewriting 155:5 typical 146:13 146:16 151:23 typically 142:22 146:1,9 124:10 125:8 125:21 126:9 132:1 understanding 130:24 139:9 148:5 understood 125:25 146:4,8 151:23 united 119:1,6 119:10,15 121:16 122:3,8 125:4 152:8,11 152:15 witness 122:11 152:15 witnesses 153:24 words 127:13 work 127:25 130:18 146:1,9 146:11,13,16 146:18 worked 142:21 worker 149:10	155:6	_		west 119:20
125:19 124:10 125:8 125:4 152:8,11 witness 122:11 140:1,5 145:14 132:1 132:1 videotaped 153:24 155:5 146:16 151:23 146:16 151:23 videotaped 153:24 146:16 151:23 125:25 146:4,8 19:18 visiting 137:22 words 127:13 125:15 words 127:13 words 127:13 125:25 146:4,8 visiting 137:22 volume 119:6 125:20 visiting 137:22 volume 119:6 125:25 146:4,8 visiting 137:22 vorks 127:13 125:25 146:4,8 visiting 137:22 volume 119:6 125:25 146:4,8 visiting 137:22 vorks 127:13 125:25 146:4,8 visiting 137:22 vorks 127:25 130:18 146:1,9 146:11,13,16 146:18 vorked 142:21 133:20 135:22 vorker 149:10	try 125:10,13			121:8
two 128:4 125:21 126:9 152:16 152:15 type 148:22 148:22 148:5 148:5 148:5 153:24 typical 146:16 151:23 146:16 151:23 146:17:13 146:14:1,13,16 146:18 146:18 typically 142:22 146:1,9 146:11,13,16 146:18 146:18 146:18 typically 140:13 140:	125:19		,	witness 122:11
141:1,5 145:14 132:1 videotaped 153:24 typewriting 130:24 139:9 visiting 137:22 155:5 148:5 volume 119:6 typical 146:16 151:23 vs 119:4,9,13 typically 151:23 wade 120:8 142:22 146:1,9 119:10,15 133:20 135:22 worked 142:21 137:20 138:11 worker 149:10	two 128:4		·	152:15
type 148:22 understanding 119:18 words 127:13 typical 146:16 151:23 typically 142:22 146:1,9 wade 120:8 typically 142:22 146:1,9 wade 120:8 142:22 146:1,9 wade 120:8 133:24 works 127:25 130:18 146:11,13,16 146:18 worked 142:21 146:18 worked 142:21 146:18 worker 149:10	141:1,5 145:14			witnesses
typewriting 155:5 typical 146:13 146:16 151:23 typically 142:22 146:1,9 130:24 139:9 148:5 understood 125:25 146:4,8 151:23 united 119:1,6 119:10,15 visiting 137:22 volume 119:6 vs 119:4,9,13 words 127:13 work 127:25 130:18 146:1,9 146:11,13,16 146:18 worked 142:21 worker 149:10	type 148:22		_	153:24
155:5 typical 146:13 146:16 151:23 typically 142:22 146:1,9 130:24 139.9 148:5 understood 125:25 146:4,8 151:23 united 119:1,6 119:10,15 visiting 137.22 volume 119:6 vs 119:4,9,13 46:11,13,16 146:18 wade 120:8 133:20 135:22 137:20 138:11 work 127:25 130:18 146:1,9 146:11,13,16 146:18 worked 142:21 worker 149:10	typewriting			words 127:13
typical 146:13 146:16 151:23 understood typically 125:25 146:4,8 142:22 146:1,9 wade 120:8 130:18 146:1,9 146:11,13,16 146:18 worked 142:21 137:20 138:11	155:5			work 127:25
146:16 151:23 typically 142:22 146:1,9 united 119:1,6 119:10,15 vs 119:4,9,13 w 146:11,13,16 146:18 worked 142:21 worker 149:10	typical 146:13			130:18 146:1,9
typically 142:22 146:1,9 united 119:1,6 119:10,15 w 146:18 worked 142:21 worker 149:10	146:16 151:23		, ,	146:11,13,16
142:22 146:1,9 wade 120:8 worked 142:21 worker 149:10	typically	· · · · · · · · · · · · · · · · · · ·	W	· · ·
119:10,15 133:20 135:22 worker 149:10	• -		wade 120:8	worked 142:21
13/:/0 138:11		<u> </u>	133:20 135:22	worker 149:10
122.0 123.24		,	137:20 138:11	
		122.0 123.24		

[workers - youngsters]

Page 14

workers 140:21	youngsters
150:6,21	143:21
working	
146:19 147:4	
written 145:20	
wrong 137:9	
y	
yeah 127:7,8,12	
129:14,21	
130:2 131:12	
132:9,17	
134:14,21,23	
134:25 135:17	
135:19 136:16	
136:25 137:13	
137:16,18	
138:2,5 139:2	
139:18 141:10	
141:12,20	
142:3,6,7,10,25	
143:25 144:9	
145:5,19,19	
146:3,5,15	
147:3,5 148:6	
148:8,12,17	
149:4,11,20,23	
150:10,11	
151:22 152:1	
year 139:14	
144:18	
years 151:25	
yesterday	
145:4	
younger 143:24	
143:25	

Veritext Legal Solutions

800.808.4958 770.343.9696

Federal Rules of Civil Procedure Rule 30

- (e) Review By the Witness; Changes.
- (1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:
- (A) to review the transcript or recording; and
- (B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.
- (2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES

ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1,

2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES

OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.